

OFFICE OF SAFEGUARDS AND SECURITY EVALUATIONS

SAFEGUARDS AND SECURITY APPRAISAL PROCESS GUIDE



AUGUST 2000

**U.S. Department of Energy
Office of Safeguards and
Security Evaluations
19901 Germantown Road
Germantown, Maryland 20874**

Preface

The Office of Independent Oversight and Performance Assurance (OA) has published the Appraisal Process Protocols to describe the philosophy, scope, and general procedures applicable to all independent oversight appraisal activities. The Office of Safeguards and Security Evaluations (OA-10) prepared this companion volume, the Safeguards and Security Appraisal Process Guide, as part of a continuing effort to enhance the quality and consistency of safeguards and security inspections. When used in conjunction with the OA Appraisal Process Protocols, this Safeguards and Security Appraisal Process Guide provides necessary guidance for conducting safeguards and security inspections; it also offers techniques, formats, and sample documents useful in planning for, conducting, and reporting the results of safeguards and security inspections.

The two process documents, along with OA-10's topic-specific inspectors guides, provide a

comprehensive set of guidance and tools that better enable OA-10 inspectors to evaluate safeguards and security program effectiveness across the Department of Energy (DOE) complex.

Although the process guide is primarily germane to OA-10, it is made available to the field through the DOE's home page to assist in the conduct of field surveys or self-assessments. A loose-leaf format was selected so that inspectors can remove and copy sections for ready reference.

OA-10 anticipates making periodic revisions to this guide in response to changes in DOE program direction and guidance, insights gained from independent oversight activities, and feedback from customers and constituents. Therefore, users of this process guide are invited to submit comments and recommendations to the Office of Safeguards and Security Evaluations.

This page is intentionally left blank.

Contents

References	v
Acronyms	vii
Definitions	ix
Section 1. Introduction	1
Mission	1
About This Guide	2
Scope of Inspections	3
Section 2. Approach	5
Introduction	5
Inspection Goals and Philosophy	5
Staff Inspection Roles	5
Major Inspection Phases	8
Compliance Versus Performance	9
Local Representatives	9
Inspection Standards	9
Inspector Proficiency	10
Reporting	10
Section 3. Planning	13
Introduction	13
Goals and Objectives	13
Preplanning Activities	14
Team Planning Activities	15
Topic Team Planning Tasks	16
Post-Planning Meeting Activities	24
Continuing Planning Activities	24
Section 4. Conduct	27
Introduction	27
Goals	27
Scope of the Onsite Inspection	27
Protection of Classified Information	28
Relations with Site and Headquarters Personnel	28
Data Collection	28

Contents (Continued)

Integration	32
Validation.....	32
Section 5. Closure	35
Introduction	35
Goals	35
Data Review	36
Integration	36
Analysis of Results	36
Determining Findings	36
Ratings	37
Focus Briefing	37
Report Preparation	38
Additional Team Responsibilities	39
Process Improvement	39
Outbriefing	39
Section 6. Follow-up	41
Introduction	41
Goals	41
Headquarters Briefings	41
Policy Issue Papers	41
Final Report	42
Corrective Action Plan Review	42
Corrective Action Tracking and Follow-up	42
Appendix A. Comprehensive Inspection Report Format	A-1
Appendix B. Forms	B-1

References

DOE Notice 205.1, Unclassified Computer Security

DOE Order 413.1, Management Control Program, 12/6/95

DOE Order 440.1A, Worker Protection Management for DOE Federal and Contractor Employees, 3/27/98

DOE Order 470.1, Safeguards and Security Program, Change 1, 6/21/96

DOE Order 470.2, Safeguards and Security Oversight Assurance Program, 12/23/98

DOE Order 471.2A, Information Security Program, 3/27/97

DOE Order 473.2, Protective Force Program

DOE Manual 473.2-2, Protective Force Program Manual

DOE Manual 475.1-1, Identifying Classified Information, 5/8/98

DOE Order 5631.2C, Personnel Security Program, 9/15/92

DOE Order 5632.1C, Protection and Control of Safeguards and Security Interests, 7/15/94, Rescinded and Superseded by DOE Manual 472.1-1, 5/22/98

DOE Order 5633.3A, Control and Accountability of Nuclear Materials, 9/7/95, Rescinded and Superseded by DOE Order 474.1, 8/11/99

DOE Order 5639.6A, Classified Automated Information Systems Security Program, 7/15/94, Rescinded and Superseded by DOE Order 471.2A

DOE Manual 5639.6A-1, Manual for the Classified Automated Information System Security Program, 7/15/94, Rescinded and Superseded by DOE Manual 471.2-2, 8/3/99

Context and Protocols for Performance Testing of Protective Forces (Office of Oversight), February 1999

This page is intentionally left blank.

Acronyms

These acronyms are commonly encountered in DOE safeguards and security.

CSO	Cognizant Secretarial Office
DOE	Department of Energy
LPSO	Lead Program Secretarial Office
OA	Office of Independent Oversight and Performance Assurance
OA-10	Office of Safeguards and Security Evaluations
OPSEC	Operations Security
PPM	Protection Program Management
S&S	Safeguards and Security
SNM	Special Nuclear Material

This page is intentionally left blank.

Definitions

Inspection Program Terms

(These definitions supplement those found in the OA Appraisal Process Protocols.)

Accepted Risk: The acknowledgement that a protection system may not achieve 100 percent protection against all occurrences, but further improvement in the system is not justified.

Access Authorization or Security Clearance: An administrative determination that an individual is eligible for access to Restricted Data, other classified information, or special nuclear material. The individual may be a DOE employee or an applicant for DOE employment, a consultant, an assignee, another Federal department or agency employee (or other persons designated by the Secretary of Energy), or a DOE contractor or subcontractor employee. Clearances granted by DOE are designated as “Q,” “L,” “Top Secret,” or “Secret.”

Access Control: The process of limiting access to the resources of a system only to authorized users, programs, processes, or other systems.

Access Control Measures: Hardware and software features, operating procedures, management procedures, and various combinations of these designed to detect and prevent unauthorized access and to permit authorized access to a system.

Accountability (nuclear material): That part of safeguards which encompasses the measurement systems and records and reports to account for special nuclear material (SNM).

Classified Document: Any document containing classified information; any document containing information the disclosure of which could damage the national security of the U.S. or its allies.

Classified Information: Any information that requires protection against unauthorized disclosure in the interests of the national defense and security or foreign relations of the United States pursuant to U.S. statute or Executive Order. The term includes Restricted Data, Formerly Restricted Data, and National Security Information, each of which has degrees of importance denoted by the classifications Top Secret, Secret, and Confidential.

Classified Interest: Classified documents, information, or material including classified SNM possessed by the Department, a contractor of the Department, a Departmental facility, or any other facility under the Department's jurisdiction.

Classified Materials: Chemical substances, including metals, fabricated or processed items, or machinery and equipment that have been classified by proper authority.

Classified Matter: Classified information, documents, parts, components, or other material.

Competency: The ability to perform a task, including whatever knowledge, skills, and attitudes are needed.

Compromise: Acquisition of classified information by persons not authorized to receive such information.

Consequences: The loss caused as a result of a successful attack on a target. Consequences may include damage to a national program, adverse publicity, etc., as well as direct monetary loss. Non-monetary loss considerations complicate the calculation of risk and introduce an element of subjectivity into risk assessment.

Critical Assets: Those physical and information assets required for the performance of the site mission.

Custodian (nuclear material): Any person having assigned responsibility for the control and accountability of classified matter.

Cyber Security: The protection resulting from all measures designed to prevent deliberate or inadvertent unauthorized disclosure, acquisition, manipulation, modification, or loss of information contained in a computer system, as well as measures designed to prevent denial of authorized use of the system.

Damage Assessment: An estimate of the damage to national security in the event that classified information is compromised or potentially compromised. This estimate is used to determine the potential value of the compromised information to foreign governments and/or hostile organizations.

Design Basis Threat Policy: A policy statement that describes threats that are postulated for the purpose of establishing requirements for safeguards and security significant programs, systems, components, equipment, information, or material.

Detection: The positive assessment that a specific object is the cause of an alarm.

Diversion: The transfer of nuclear material from its authorized use and/or location.

Document: Any record of information regardless of physical form or characteristics, including, but not limited to, the following: (1) all handwritten, printed, or typed matter; (2) all painted, drawn, or engraved matter; (3) all sound, magnetic, electromechanical, or optical recordings; (4) all photographic prints, exposed or developed film, and still or motion pictures; (5) automatic data processing input, memory, program, or output information or records such as punch cards, tapes, memory drums or disks, or visual displays; and (6) all reproductions of the foregoing by any process.

Draft Inspection Reports: Reports, not yet finalized, that contain inspection observations, issues, analyses, and ratings. Draft inspection reports are provided to managers as appropriate to allow timely discharge of their respective duties and responsibilities.

Exercise: A scheduled and planned event that tests the integrated capability and a major portion of the elements of a protection program as specified in that program's security plans and procedures.

Implementation Plan: A concise description of the approach, resources, and time period planned for implementing orders that require such plans on a sitewide basis. The plan includes a description of the execution of environmental protection, safety, and health responsibilities and authorities by a field organization, and any proposed generic exemptions to parts of such DOE orders.

Level of Protection: The degree of safeguards and security provided to protect Departmental interests.

Line Management: The unbroken linkage of management personnel responsible for an organization's direction, operations, performance, and effectiveness. In DOE, it is the chain of command that extends from the Secretary to representatives of the Cognizant Secretarial Office (CSO), who set program policy and plans and develop assigned programs; to the field organization managers, who are responsible to the CSO for execution of these programs; and to the contractors and subcontractors who conduct the programs. Line management consists of DOE and contractor personnel organizationally or contractually responsible for work or job tasks, as well as effective security.

National Security: The national defense and foreign relations of the United States.

Operations Security (OPSEC): A program designed to disrupt or defeat the ability of foreign intelligence or other adversaries to exploit sensitive Departmental activities or information and to prevent the unauthorized disclosure of such information.

Personnel Security: The procedures established to ensure that all personnel who have access to any classified information have the required authorities, as well as the appropriate clearance.

Physical Security: (1) The use of locks, guards, badges, alarms, and similar measures to control access; (2) The measures required for the protection of structures housing the system from espionage, theft, or damage by accident, fire, and environmental hazards.

Protection Program: The total program that includes all aspects of the DOE's activities directed toward protection of national security interests and DOE property. Any adverse impacts on the health and safety of the public resulting from implementation or failure of elements of the protection program are also included.

Protection Program Topic Areas: Subject areas that are used to logically address the many elements of a protection program. From time to time modifications of the scope of certain topic areas may be necessary to accommodate site-specific concerns and programs as well as changes in threats, protection concepts, and technologies.

Risk: The chance that a specific attack against a system vulnerability will lead to loss of an asset.

Risk Analysis (Risk Assessment): An analysis of system assets and vulnerabilities to establish expected loss from certain events based on the estimated probabilities of occurrence of those events.

Sensitive Information: Information that, as determined by competent authority, must be protected because its unauthorized disclosure, alteration, loss, or destruction will cause perceptible damage to some person, organization, or mission.

Sensitive/Unclassified Information: Unclassified but sensitive data requiring protection because of the risk and magnitude of loss or harm that could result from inadvertent or deliberate disclosure.

Technical Security: Includes technical surveillance countermeasures, communications security, and the prevention or suppression of compromising emissions and emanations.

Technical Surveillance: The covert installation of devices or equipment to visually or audibly monitor activities within a target area to acquire information by technical means.

Technical Surveillance Countermeasures: Systematic and effective measures for the detection and nullification of technical surveillance penetrations, technical surveillance hazards, and physical security weaknesses.

Tempest: Short name referring to investigation, study, and control of compromising emanations from telecommunications and automated information systems equipment.

Theft: The removal of government property and/or materials from a DOE or DOE contractor-operator facility without permission or authorization and contrary to law, or the unauthorized removal of SNM.

Threat: A possible event that can, if it occurs, exploit a vulnerability. Threats include both hazards and the triggering of flaws.

Threat Analysis: An analysis of the probability of occurrence and consequences of damaging events.

Threat Statement: A statement of actions and events that can adversely affect the security of a system.

Vulnerability: A weakness in procedures, administrative controls, internal controls, etc., that could be exploited to gain unauthorized access to resources.

Vulnerability Assessment: A systematic evaluation process in which qualitative and/or quantitative techniques are applied to arrive at an effectiveness level for a safeguards and security system to protect specific targets from specific adversaries and their acts.

Section 1

INTRODUCTION

Contents

Mission.....	1
About This Guide.....	2
Scope of Inspections.....	3

Mission

The Office of Safeguards and Security Evaluations (OA-10) conducts all independent appraisals of Department of Energy (DOE) safeguards and security programs. These appraisals include inspections, assessments, and special studies that evaluate the effectiveness and implementation of DOE safeguards and security policies and programs across the DOE complex. OA-10 reports the results of these activities to the Secretary, Deputy Secretary, Under Secretary, senior DOE Headquarters and field managers, and others, as appropriate. The results are also used as input to the Annual Report to the President and the Annual Report to the Secretary regarding the status of safeguards and security in the Department.

OA-10 directs its activities toward independently evaluating DOE safeguards and security programs, while line management responsibility for safeguards and security programs and policy is exercised through the program secretarial officers and the Office of Security and Emergency Operations, respectively. OA-10 provides the Department with an independent assessment of the status of safeguards and security programs to complement the views and assessments of the programmatic and policy managers. Further, OA-10 analyzes Department-wide indicators and trends from a broad, Departmental viewpoint, thus providing a

unique perspective on safeguards and security concerns. Results are reported to appropriate Headquarters and field element managers.

Appraisals are designed to determine the adequacy of safeguards and security policies and programs, the adequacy of policy and program implementation, and their effectiveness in protecting DOE's national security interests. OA-10 currently conducts various types of appraisals:

- **Comprehensive inspections** determine the adequacy of protection programs by examining a broad range of safeguards and security topic areas at a specific location. They are comprehensive in their technical span and in their consideration of all national security interests at the facilities inspected.
- **Special inspections** include reinspections, unrated reviews, major performance tests, or other inspection activities required on a one-of-a-kind basis. OA-10 conducts special inspections in much the same manner as comprehensive inspections; however, procedures are modified as required. Special inspections (with the exception of major performance tests) are usually more limited in scope than comprehensive inspections, requiring fewer resources and less time spent at the field site. Major performance tests are significant efforts, and are

conducted in accordance with the *Context and Protocols for Performance Testing of Protective Forces*.

- **Follow-up Reviews** are conducted to determine the status and progress of corrective actions and other activities in response to deficiencies previously identified by OA-10 appraisals. Ratings may be assigned as a result of follow-up reviews.
- **Assessments** address the effectiveness of protection program elements as implemented across the DOE by analyzing complex-wide protection issues and providing recommendations for improvement. Assessments also may provide an analysis of a specific item of policy as implemented across the DOE complex, rather than an analysis of the broader issues of protection program elements. Conclusions and recommendations (if appropriate) are published, but ratings are not normally assigned.
- **Special studies** are performed as required to address an area, a concern, or an issue within the safeguards and security program. They also may address areas outside safeguards and security that affect the safeguards and security program. Special studies may focus on the status of a specific program element, the adequacy of selected safeguards and security policies, or the status of specific policy implementation throughout DOE. Special studies contain conclusions and recommendations, but ratings are not normally assigned.
- **Special reviews** are the responsibility of the Office of Cyber Security and Special Reviews (OA-20); however, OA-10 provides personnel and other resources when necessary to assist in special reviews. Special reviews are conducted at the request of the Secretary or other senior DOE managers who require, on an expedited basis,

information regarding the status of a particular program, program element, issue, or Departmental function.

About This Guide

This Safeguards and Security Appraisal Process Guide is a companion publication to the Office of Independent Oversight and Performance Assurance (OA) Appraisal Process Protocols. While the OA Appraisal Process Protocols provide general guidance common to all OA appraisal activities, this OA-10 guide provides additional detail and guidance regarding procedures and methods specific to safeguards and security appraisals conducted by OA-10. Since the intent is to maintain both process documents in a single binder, every effort has been made to avoid unnecessary duplication among the two guides. For that reason, text in this guide sometimes refers to sections or appendices in the OA Appraisal Process Protocols. OA-10 inspectors should maintain familiarity with information in both documents.

This guide focuses on the inspection process, specifically: comprehensive inspections, special inspections, and follow-up reviews. OA-10 also conducts assessments and special studies as necessary. While those types of appraisals are not specifically addressed in this guide, the processes associated with those activities differ from that of inspections only in detail; much of the information provided herein also applies to those non-inspection activities. For example, the five appraisal phases and the types of activities associated with each phase generally apply; similar data collection methods are used; and validation, analysis, and report-writing requirements are similar. When the specific needs of an assessment or special study require a significant deviation from the process, methods, and techniques described in this guide, OA-10 will develop a project plan to guide the assessment or special study.

Scope of Inspections

OA-10 inspections examine the effectiveness of safeguards and security protection programs in various topical areas, including but not limited to:

- Protection program management
- Personnel security
- Classified matter protection and control
- Physical security systems

- Protective force
- Material control and accountability.

Figure 1 shows these traditional topics and the subtopics and programs included in each.

In addition to examining and rating the status of these topical areas, and providing potential enhancements when appropriate, OA-10 integrates the inspection results from the areas inspected and assigns an overall rating for safeguards and security program effectiveness.

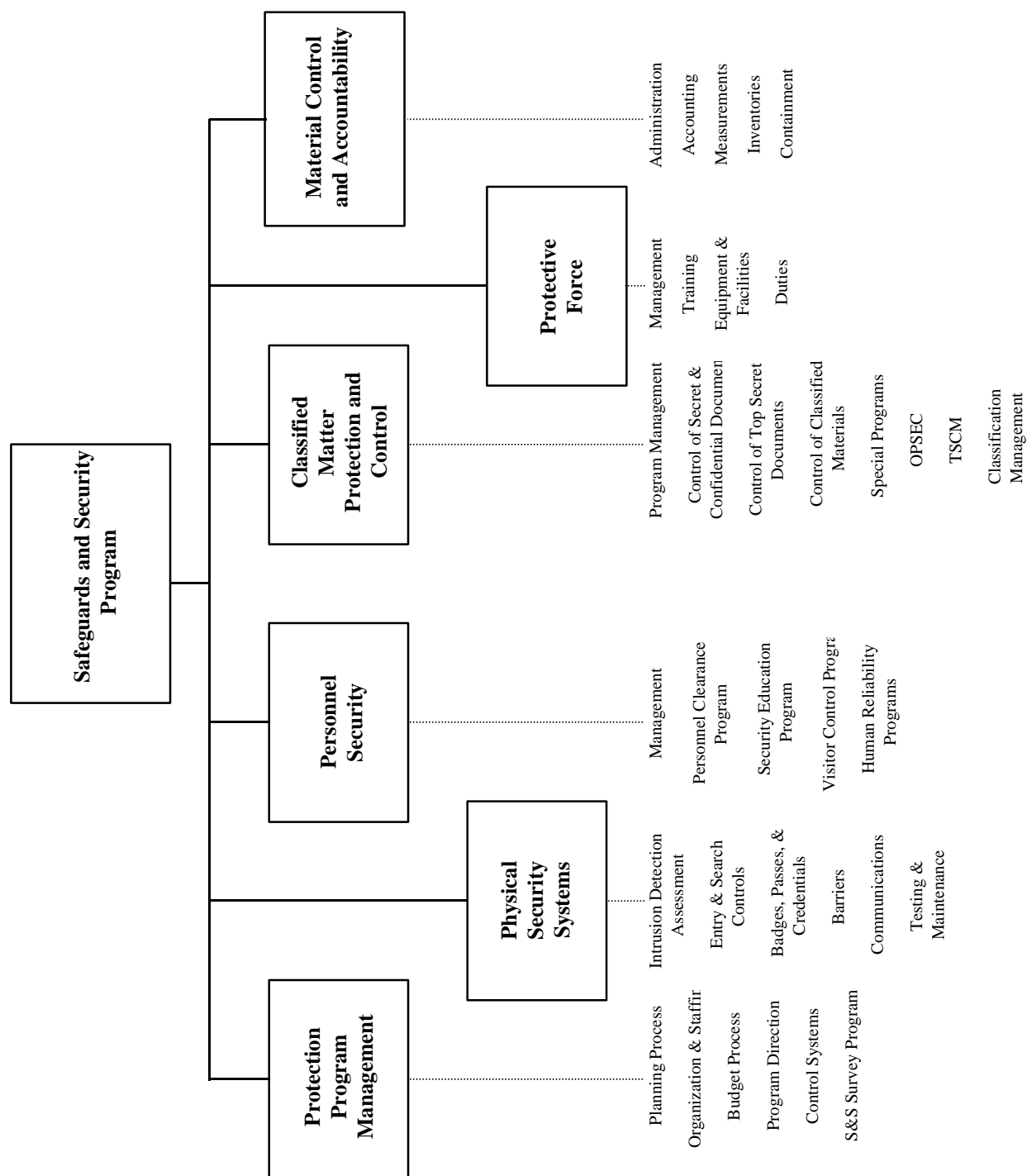


Figure 1. Inspection Topic Content

Section 2

APPROACH

Contents

Introduction	5
Inspection Goals and Philosophy	5
Staff Inspection Roles	5
The Director of Independent Oversight and Performance Assurance.....	6
The Director, Office of Safeguards and Security Evaluations.....	6
The Inspection Chief.....	6
The Deputy Inspection Chief.....	7
Administrative Support Coordinator.....	7
The Topic Lead	7
Major Inspection Phases.....	8
Compliance Versus Performance	9
Local Representatives	9
Inspection Standards	9
Inspector Proficiency.....	10
Reporting.....	10

Introduction

OA-10 achieves the consistency and discipline required to conduct a meaningful and valid inspection program by adhering to and applying established and accepted standards during all phases and aspects of the independent oversight process. The foundations of OA-10's approach to inspections have been developed over time, through experience, and are frequently reviewed and refined. This section addresses some fundamental aspects of OA-10's inspection approach and discusses major responsibilities of key participants in the process.

Inspection Goals and Philosophy

The major goals of the OA oversight process and the underlying philosophy that guides OA's efforts to achieve those goals are stated in

Section 2 of the OA Appraisal Process Protocols.

OA-10 accepts and adopts those goals and that philosophy, in their entirety, and applies them to the safeguards and security oversight process.

Staff Inspection Roles

To ensure that planning, conduct, closure, and follow-up activities are effectively accomplished, key functions and tasks are assigned to various positions based on inspection experience and OA-10 organizational assignments. These functions and positions are frequently reviewed to ensure that OA-10 remains organized to effectively accomplish its oversight responsibilities. What follows is a summary of the key positions involved in the OA-10 inspection process.

The Director of Independent Oversight and Performance Assurance

The Director of Independent Oversight and Performance Assurance provides direction and guidance to the Director, Office of Safeguards and Security Evaluations, relative to scheduling and the overall conduct of inspections and other appraisal activities. Guidance provided includes any senior DOE management concerns, issues that could affect inspections, and matters of concern to external agencies and Congress.

The Director, Office of Safeguards and Security Evaluations

The Director, Office of Safeguards and Security Evaluations, directs and oversees the inspection process. The Director provides all pertinent information to the designated Inspection Chief, assuring that the Inspection Chief tasks the appropriate personnel to serve on the various inspection topic teams. The Director reviews ongoing plans to ensure that they address all identified concerns. During the inspection, the Director monitors progress, provides guidance, participates on the Quality Review Board, and meets with site/facility management as appropriate. After the inspection, the Director may provide briefings to the Secretary, Under Secretary, Deputy Secretary, Lead Program Secretarial Officers, Congressional committees, or other groups who have a legitimate interest in inspection results.

The Director may also choose to assume the role of Inspection Chief; this more commonly occurs during major efforts, such as comprehensive inspections.

The Inspection Chief

The Inspection Chief is responsible for all aspects of an inspection or follow-up review.

The Inspection Chief: 1) manages all phases of the inspection; 2) provides continuity throughout the inspection process; 3) ensures that inspection activities remain properly focused; 4) keeps OA and OA-10 management informed of progress and significant details; and 5) ensures that information is disseminated to appropriate inspection team members. In short, the Inspection Chief is responsible for keeping the inspection process on track.

The Inspection Chief assigns responsibilities for preplanning tasks and assures that all such tasks are accomplished. After reviewing results of the preplanning effort and conferring with OA-10 management, the Inspection Chief proposes a scope and focus for the inspection.

The Inspection Chief is responsible for the conduct of the planning meeting and for ensuring the completion of an Inspection Plan. The Inspection Chief monitors the activities of the topic leads, ensuring that they review appropriate information. The Inspection Chief provides direction to the topic teams to ensure that the inspection focus is understood and that the proposed scope of the inspection is feasible. The Inspection Chief meets frequently with the topic leads during the course of the planning and data collection efforts.

During onsite inspection activities, the Inspection Chief maintains the focus of the inspection, ensures that OA-10 management initiatives are accomplished, establishes priorities, resolves conflicts, communicates information to site management as appropriate, keeps OA-10 management informed, and oversees the activities of the inspection team. After the onsite inspection, the Inspection Chief ensures that the inspection report is finalized, Headquarters briefings are scheduled and conducted, corrective action plans are reviewed, and the After-Action Report and policy issues are completed.

The Deputy Inspection Chief

The Deputy Inspection Chief provides support to the Inspection Chief in all phases of the inspection. A primary responsibility of the Deputy Inspection Chief is to assume the duties of the Inspection Chief if the Inspection Chief is absent, thus ensuring continuity of the inspection process. The Deputy Inspection Chief also performs other activities at the direction of the Inspection Chief. These assignments vary from inspection to inspection depending on the Inspection Chief's needs and the scope of the inspection.

Various logistical and administrative duties are typically assigned to the Deputy Inspection Chief, such as preparing resource lists, coordinating security clearance requirements, arranging hotel accommodations, preparing handouts for topic teams, and coordinating safety plans. Also, the Deputy Inspection Chief prepares correspondence relative to inspection notification, document requests, and distribution of the draft and final reports.

During the conduct phase of the inspection, the Deputy Inspection Chief may act as a topic team member or topic lead. At other times, the Deputy Inspection Chief assists the Inspection Chief in conducting the daily inspection team meetings, in preparing daily reports to management, and in ensuring that report preparation runs smoothly and on schedule. After inspection closure, the Deputy Inspection Chief prepares the After-Action Report.

In cases where inspection scope is limited or narrow, such as some special inspections or follow-up reviews, a Deputy Inspection Chief may not be required. In some inspections, the Deputy Inspection Chief will also perform the functions of the Administrative Support Coordinator.

Administrative Support Coordinator

The Administrative Support Coordinator is the point of contact for all inspection administrative and logistical support. This includes arrangements with the inspected site's point of contact for office space, telephone service, classified and unclassified storage, reproduction and destruction, fax service, and communication between the site and DOE Headquarters. The Administrative Support Coordinator makes arrangements for computer support and acts as the Computer System Security Officer during the inspection. The Administrative Support Coordinator supervises the inspection team's administrative staff on site, ensures the availability of necessary support, ensures control and accountability of classified documents, and oversees the preparation of the draft inspection report, final report, and memoranda.

The Topic Lead

A topic lead is assigned to each topic team participating in an inspection or a follow-up review. The topic lead is responsible for managing the efforts of the topic team and for keeping the Inspection Chief informed of salient topic team activities during the inspection. In particular, the topic lead is the focal point for the topic team and is responsible for coordinating and focusing the activities of the team, ensuring that deliverables are prepared and provided according to the schedule, promoting integration with other topic teams, and acting as spokesperson during meetings and briefings.

Figure 2 summarizes the roles and responsibilities of key staff members.

DIRECTOR OF OVERSIGHT ASSURANCE AND PERFORMANCE ASSURANCE <ul style="list-style-type: none"> • Responsible for DOE S&S oversight assurance • Provides overall direction • Establishes inspection schedules • Addresses DOE management concerns 	DEPUTY INSPECTION CHIEF <ul style="list-style-type: none"> • Assists in the preplanning effort • Coordinates logistics requirements • Prepares correspondence • Coordinates personnel support activities • May serve on topic team • Assists in preparation of the inspection report • Prepares the inspection After-Action Report
DIRECTOR, OFFICE OF SAFEGUARDS AND SECURITY EVALUATIONS <ul style="list-style-type: none"> • Directs and oversees the oversight assurance inspection process • Recommends inspection schedules • Designates Inspection Chief 	ADMINISTRATIVE SUPPORT COORDINATOR <ul style="list-style-type: none"> • Responsible for inspection administrative/logistical support • Provides for computer support, fax, telephones, and office space • Point of contact for onsite inspection support • Ensures control and accountability of classified documents • Supervises administrative staff • Prepares memoranda
INSPECTION CHIEF <ul style="list-style-type: none"> • Manages the inspection/review • Recommends topic team members • Conducts preplanning and planning activities • Establishes priorities and resolves issues • Ensures that oversight assurance management initiatives are accomplished • Monitors topic teams • Keeps oversight assurance management informed 	TOPIC TEAM LEAD <ul style="list-style-type: none"> • Leads and manages the topic team • Leads and coordinates the topic planning effort • Makes team assignments and coordinates topic team data collection activities • Prepares team schedule (comprehensive inspections only) • Briefs Inspection Chief and OA-10 Director • Validates data collected with site points of contact

Figure 2. Summary of Staff Inspection Roles

Major Inspection Phases

OA-10 safeguards and security inspection activities may be characterized by the functional phases into which they are organized: planning, conduct, closure, and follow-up.

The **planning** phase includes those activities necessary to prepare for all aspects of an inspection. The **conduct** phase includes the portion of the site visit principally devoted to collecting and validating data. The **closure** phase involves data integration and analysis, issue identification, rating determination, draft report preparation and quality review, and

internal management briefings. The **follow-up** phase includes comment review and final report preparation, Headquarters briefings, corrective action plan reviews, and corrective action tracking.

Although these phases are identified by the primary activities they encompass, actual inspection activities may overlap significantly. For example, some data are collected during the planning phase, and planning (particularly for performance testing) can extend into the conduct phase. Similarly, analysis begins during data collection and continues throughout the process. Subsequent sections of this guide discuss each of these phases in greater detail.

Figure 3 illustrates the major inspection activities for comprehensive inspections.

Compliance Versus Performance

DOE safeguards and security policy requires that certain functions be performed and that certain levels of protection be achieved. However, policy does not always specify how those functions or protection levels are to be achieved. Although compliance with DOE policies and procedures is mandatory, failure to comply with one or more specific provisions does not by itself indicate an unsatisfactory program if adequate protection is provided by other means. Conversely, mere compliance with policies and procedures may not produce an effective program—a program may be in compliance, but not actually performing well. OA-10's inspection approach therefore considers both compliance and performance.

OA-10's procedure is to include in the inspection report any issues regarding significant cases of non-compliance, while also setting forth mitigating circumstances and providing an analysis of whether program objectives have been met and maintained. Although OA-10 considers mitigating factors when assigning ratings, the facility must take corrective actions to achieve compliance whenever a DOE requirement is not being met.

Mitigating factors may exist for both compliance and performance issues. Deficiencies in program or system performance may be mitigated by the existence of alternative processes or controls, such as:

- Alternative documentation indicating that required functions were performed, factors considered, or decisions made
- Complementary procedures or features that function effectively
- Demonstration, through performance testing, that DOE assets are afforded a level of

protection equivalent to that specified by DOE orders.

Local Representatives

The cooperation and assistance of DOE field element and facility representatives is essential in order to conduct thorough, efficient, and fair inspections. Local representatives provide detailed site and system knowledge for planning; arrange administrative and logistical support; expedite inspection activities; and identify the local points of contact who participate during data gathering and validation.

Relations between the inspection team and local representatives should be cordial, open, and professional. However, the role of local representatives must remain limited to assisting the team, with OA-10 determining what to inspect and how to conduct the inspection. A detailed discussion of expectations for professional conduct of inspection team members vis-à-vis local representatives is contained in Appendix B of the OA Appraisal Process Protocols.

Inspection Standards

Inspections determine the adequacy of safeguards and security programs by comparing capabilities and performance against established standards. The standards applied come from various sources at the national and local levels.

National standards are the basic requirements with which DOE protective programs must comply. They are established by Congress, the DOE, and other executive agencies. DOE policy is promulgated through DOE directives; other national standards are exemplified by applicable public laws, Executive Orders, and other directives.

Local standards are those imposed by the local DOE field element, the facility contractor, or subordinate contractors responsible for administering protection programs within their

areas of operation. Local standards usually deal with site-specific implementation of national requirements, but may impose more stringent requirements. They are promulgated through DOE field element implementing instructions, contractor procedures, and Site Safeguards and Security Plans. OA-10 reviews and may use appropriate local standards to inspect programs, especially if they differ from or cover areas not addressed by national requirements.

Inspector Proficiency

OA-10 inspectors must be thoroughly familiar with DOE policies and procedures, technically competent and current in their assigned safeguards and security topic areas, and cognizant of OA-10 inspection philosophy and standards. Additionally, they must clearly demonstrate an ability to successfully perform all necessary functions associated with planning, conducting, closing, and following up on OA-10 inspections.

It is essential that individuals selected as OA-10 inspectors have the skills, knowledge, and abilities necessary to provide outstanding performance in the conduct of inspections. The significance of the Independent Oversight role, the protection of national security interests, public safety, and DOE program operations dictates the requirement to ensure the highest degree of proficiency for all Independent Oversight inspectors.

Reporting

The end product of an inspection is the inspection report. The purpose of the report is to clearly present the results of the inspection, identifying and analyzing the impact of strengths and weaknesses. Although the report has several audiences, it is essentially a management-level portrayal of the status of safeguards and security at the inspected facility or field element. Report preparation is addressed in more detail in Section 5, Closure, and in Appendix A, Comprehensive Inspection Report Format.

Comprehensive Inspection

Development of the Inspection Schedule

- Selection of sites
- Scheduling comprehensive inspections
- Notify site to be inspected

Preplanning Activities

- Assign preplanning responsibilities
- Recommend inspection focus
- Request documents from site
- Make logistics arrangements
- Conduct Headquarters interviews

Field Planning Meeting

- Review documents
- Meet with site representatives
- Prepare for onsite activities
- Begin onsite data collection

Field Inspection

- Conduct onsite data collection activities
- Validate data

Inspection Closure Activities

- Develop draft inspection report
- Provide draft report to site for factual accuracy
- Provide outbriefing for site managers

Inspection Follow-up Activities

- Receive site comments on inspection report at Headquarters
- Prepare final inspection report
- Brief S-1, S-2, S-3, other senior managers, and Congressional committees
- Review corrective action plans

Figure 3. Major Inspection/Review Activities

This page is intentionally left blank.

Section 3

PLANNING

Contents

Introduction	13
Goals and Objectives	13
Preplanning Activities	14
Team Planning Activities	15
Topic Team Planning Tasks	16
Task 1: Review and Analyze Documentation	17
Task 2: Identify Security Interests, Threats, and Vulnerabilities	18
Task 3: Characterize the Topic	19
Task 4: Coordinate with Other Topic Teams	19
Task 5: Select Final Scope	20
Task 6: Select and Prioritize Data Collection Activities	21
Task 7: Identify and Select Sample Sizes and Configurations	21
Task 8: Assign Tasks and Schedule Activities	22
Task 9: Plan Data Collection Activities	23
Task 10: Identify and Arrange Support	24
Task 11: Brief Management	24
Post-Planning Meeting Activities	24
Continuing Planning Activities	24

Introduction

The thoroughness and quality of inspection planning significantly affects all other inspection activities. Inspection planning involves gathering and analyzing large amounts of information from many sources, making decisions based on the analysis, and preparing inspection activities based on the decisions. Because there is only a limited amount of time available on site to collect the data necessary to characterize the status of the programs being inspected, planning must focus on determining what program elements to examine and how best to inspect those elements. It also includes identifying support requirements for all phases of the inspection.

This section discusses OA-10's inspection goals and objectives, preplanning activities, the major planning activities of the topic teams, and the ongoing planning process that continues throughout the inspection. Figure 4 summarizes the major planning events.

Goals and Objectives

The goal of inspection planning is to anticipate and prepare for every action necessary to conduct the highest quality inspection possible with the resources available. At the conclusion of the planning phase, topic teams should be familiar with:

- The character of the program, including size, composition, organization, and mission
- Site management oversight responsibilities
- How personnel responsible for protection programs are trained
- The physical environment in which the program operates
- The specific areas of emphasis for the inspection
- Specific data collection methods to be used and the performance tests to be conducted, if any
- All personnel, administrative, and logistical support requirements necessary for data collection and performance testing
- The documents necessary for conducting a well-planned and effective inspection
- Procedures for communicating with management to gain approval for planned inspection scope and activities
- DOE and facility points of contact for each topic.

Preplanning Activities

Preplanning activities are conducted under the supervision of the Inspection Chief and are

Preplanning

- Review facility information
- Identify potential problem areas and inspection focus areas
- Develop and submit document request lists
- Coordinate logistics requirements
- Identify proposed inspection team members

Planning Meeting

- Site brief to team/brief team on preplanning results
- Review and analyze documents
- Refine topic focus
- Integrate planning efforts
- Conduct discussions with operations office and facility representatives
- Coordinate performance tests and safety plans
- Select samples
- Develop performance tests
- Brief Office of Independent Oversight and Performance Assurance management

Conducting the Inspection

- Complete data collection activity plans
- Revise plans, as necessary

Figure 4. Major Planning Events

aimed at laying the basic groundwork necessary to allow the inspection team to conduct its planning tasks efficiently. The Deputy Inspection Chief, Administrative Support Coordinator, and one or more staff members may be involved in preplanning activities. Specific tasks accomplished during preplanning usually include:

- Reviewing documents — such as the Site Safeguards and Security Plan, vulnerability assessments, and recent survey and inspection results — that may indicate safeguards and security program status
- Identifying potential safeguards and security program problem areas and inspection focus areas
- Developing and submitting document request lists to the DOE field element/site
- Coordinating logistic and administrative support requirements with the site
- Coordinating hotel and other logistics requirements
- Identifying proposed inspection team members
- Conducting Headquarters interviews.

Team Planning Activities

When preplanning activities are complete, detailed inspection planning begins. Detailed planning involves the entire team, begins with the planning meeting, and extends into the conduct phase of the inspection.

This detailed planning activity is normally conducted in the field at the facility being inspected. Although most detailed planning occurs during this formal planning meeting, it is important to remember that planning and

adjustments to planned activities continue throughout the inspection. This is especially true of performance test planning, since many details must be planned and the performance tests fine-tuned even as they are occurring.

The Inspection Chief conducts an orientation meeting for all inspection team members at the start of the planning meeting, and the inspected facility may be asked to provide briefings on various aspects of their safeguards and security program. The OA-10 Director (if not acting as Inspection Chief) may address the inspection team. The Inspection Chief holds a meeting with the topic leads each morning during the planning meeting to ascertain progress and to identify any problems or issues that need to be addressed.

The planning meeting is where major decisions are made, the course of the inspection is set, and most inspection details are worked out. Table 1 provides a typical schedule for a planning meeting. During this period the most intensive inspection planning activities take place.

Planning requirements are numerous and can be very complex. Planning typically involves cooperation between OA-10, the Office of Security and Emergency Operations, responsible DOE program office(s), the DOE field element, and facility contractor personnel.

The planning meeting is designed to allow inspection team personnel to meet, review available facility documentation, interview DOE field element and site personnel, identify areas to be targeted for inspection, and analyze important areas to determine how key interests can be inspected effectively. Planning meeting objectives include planning all data collection activities, developing a schedule covering the conduct and closure phases, and preparing a briefing for OA-10 management on planned topic-specific activities.

Topic Team Planning Tasks

A number of specific topic-team planning activities are listed in Figure 5. Activities are neither strictly sequential nor independent of one another. Rather, they represent a series of interrelated efforts, and team members typically work on several tasks at once.

During the planning meeting, the topic teams tour facilities, interview site personnel and review vulnerability assessments, Site

Safeguards and Security Plans, and topic-related documents. They also identify site assets, specific threats, and the site mission, including site functions and processes. The topic teams analyze data and further define the focus of inspection activities; identify key personnel to be interviewed during the inspection; determine the types of performance tests to be conducted; and review critical elements and other key information provided by the preplanning team.

Table 1. Typical Planning Meeting Daily Activities

Day	Activity
Monday	<p>Team assemblies</p> <p>Opening remarks by the Director, Office of Safeguards and Security Evaluations</p> <p>Briefing by Operations Office/facility staff</p> <p>Initial briefing by Inspection Chief</p> <p>Topic teams meet to begin planning</p> <ul style="list-style-type: none"> - Receive team assignments, focus, schedule, and deliverables requirements - Discuss internal integration - Collect documentation - Begin documentation review
Tuesday	<p>Continue planning and review of documentation</p> <p>Meet with operations office/facility points of contact</p>
Wednesday	<p>Continue planning</p> <p>Inspection documentation drafted</p>
Thursday	<p>Continue planning</p> <p>Inspection documentation finalized</p> <p>Topic leads brief Director, Office of Safeguards and Security Evaluations (entire team present at option of Director)</p>
Friday	Travel

These planning activities represent a cross-section of those necessary to prepare for a comprehensive inspection and can be applied to any program inspection. Topic teams should modify the tasks to fit unique site-specific or inspection-specific needs. The activities have been consolidated into 11 major tasks; an explanation of each task follows.

Task 1: Review and Analyze Documentation

To develop a basic understanding of the program elements at the facility, the topic team normally begins by reviewing all available documents pertaining to the program and topic to be inspected. Documents reviewed include

1. Review and analyze documentation
2. Identify site security interests
3. Identify security program mission
4. Identify appropriate threat
5. Characterize the security program being inspected
6. Identify questions, issues, and discrepancies
7. Resolve questions, issues, and discrepancies
8. Coordinate and integrate with other topic teams
9. Select inspection focus/emphasis
10. Select and prioritize data collection activities
11. Identify sample sizes and configurations (as required)
12. Select samples (as required)
13. Assign data collection tasks to team members
14. Schedule data collection activities
15. Plan data collection activities
16. Identify support requirements for return site data collection visit
17. Communicate and arrange internal support requirements
18. Communicate external support requirements to site representatives or point(s) of contact
19. Prepare performance tests/safety plans
20. Prepare and deliver management briefing input

Figure 5. Planning Meeting Activity Checklist

those obtained from Headquarters program offices and the Office of Security and Emergency Operations, as well as those requested from the DOE field element and facility to be inspected. The objective of the document review is to understand the nature of the facility to be inspected, the unique characteristics of the topic and subtopics, and the environment in which they operate. Team members concentrate on learning as much as possible about:

- **The site.** The topic team pays attention to pertinent factors such as size, facility layout, mission, special programs, program changes, or other factors that would affect the program being inspected.
- **The program's composition.** Successful planning depends on the identification of all program areas at the site to be visited, and the status of each area. Normally, DOE field elements and facility contractors maintain separate organizations that are potential inspection candidates. Although some screening usually occurs during preplanning, topic teams must ensure that all program areas of each organization are considered. Teams may also recommend new or changed areas of emphasis based on their review.
- **The program's function.** After identifying subtopics to be evaluated, the team begins to narrow the focus and concentrate on potential areas of emphasis. It becomes critical that the team understands as much as possible about how each area of the program supports each organization.

Special attention should be given to reviewing program-related issues contained in site security plans, previous inspection reports and policy issues, recent field element survey reports, and data contained in the Safeguards and Security Information Management System. Other documents that may contain pertinent information include OA-10 appraisal reports,

Government Accounting Office and Inspector General reports, and changes or policy memoranda promulgated by the Office of Security and Emergency Operations.

Often, the large quantity of available documentation requires team members to divide the documents to screen them for pertinent information. All topic team members should review appropriate sections of all documents. While there are some important documents that all team members may need to review, the topic lead may assign each team member a portion of the remaining documents based upon anticipated data collection assignments. As individuals review their assigned documents, all important information should be shared with all team members.

Task 2: Identify Security Interests, Threats, and Vulnerabilities

Document reviews and discussions with other topic teams should provide answers to three important questions:

- What security interests need to be protected?
- What threats are to be protected against?
- How does the program element (topic) function to provide the necessary degree of protection?

The answers to these three questions must be understood before meaningful planning can continue.

Determining the facility's security interests and the mission of the inspected program is usually straightforward. Documentation provides information regarding the amount, category, and location of classified interests, which can be used to prioritize the various security interests and focus the detailed planning.

Identifying and understanding threats to the inspected program helps establish parameters for a number of data collection activities. Understanding the security interests and threats permits identification of critical program element vulnerabilities and development of data collection activities to characterize the facility program's effectiveness.

Task 3: Characterize the Topic

Before deciding how to inspect a particular topic, the topic team must understand the nature of that topic. Examples of information that help define the nature of a topic are location of activities selected for inspection and distances between activities; how activities are organized; how personnel assigned program responsibilities are trained, managed and supervised; and how required elements of any protection program are implemented.

Most of this information can be found in the documents available at the planning meeting. Additionally, facility representatives can usually answer specific questions to provide a clear understanding of their programs.

Questions, issues, and discrepancies often surface during document review; for example, documents provided by the facility may be out of date or inconsistent with one another. The topic team should identify any discrepancies or questions and discuss them with the points of contact at the earliest opportunity during the planning meeting. In many cases, the points of contact can answer questions and explain inconsistencies.

In some cases, team members may identify policy issues or other items that require management attention. For example, they may question the provisions of facility operating instructions or the interpretation of a DOE order as applied at the facility. Such issues should be brought to the attention of the Inspection Chief as early as possible because resolution may require the

involvement of the Office of Security and Emergency Operations or Headquarters program offices.

Every effort should be made to resolve identified issues before the data collection visit. It is very important that inspection planning be based on accurate, up-to-date information.

Task 4: Coordinate With Other Topic Teams

Integration and coordination among topic teams is crucial to the overall inspection process. The results of individual topic team activities provide the information necessary to reach general conclusions regarding the ability of a facility to protect SNM and classified information, and to manage their safeguards and security responsibilities.

There are several major objectives of inter-team coordination. First, topic teams can coordinate efforts so that activities complement each other. For example, if valid conclusions are to be drawn regarding the protection of classified information at a specific facility location, all topic teams must collect data at the same location. It would be of little use to inspect physical security systems at one location, control of classified documents at a different location, and the protective force at yet another location.

A second objective is to ensure that topic teams benefit from the knowledge, experience, and efforts of other topic teams. Ideas from one topic team can often help another topic team focus its efforts more productively. For example, the physical security systems topic team may indicate that the implementation of physical security systems at a particular location appears to result in undue reliance on the protective force.

If the protective force topic team finds that Security Police Officers are not performing required checks at the location in question, it would have a significant impact on

the ability of the site to protect the affected security interest.

The third objective is to prevent topic teams from interfering with each other. Several topic teams may want to concentrate their activities at the same location. In such cases, coordination of data collection activities, particularly performance tests, avoids undue disruption of the inspected facility and streamlines data collection.

For example, problems may arise if the material control and accountability topic team schedules a performance test involving an emergency inventory or transfer of material in the same building and at the same time the classified matter protection and control team plans to inventory classified matter. All topic teams should be aware of what all other topic teams are doing, where they are doing it, and how it will affect their own activities.

An additional integration aspect worthy of particular mention is coordination with the protection program management (PPM) topic team. The nature of the PPM topic mandates integration with all topic teams; management of the protection program does not function in a vacuum. Topic teams may capitalize on this interaction. Information developed by the PPM topic team may affect how the results of inspection activities in other topics are viewed. Similarly, results in other topic areas will have some bearing on how the adequacy of protection program management is viewed.

All contemplated inspection activities should be reviewed to ensure that all safety issues are identified and coordinated with the appropriate individuals. For example, any contemplated performance tests with safety implications must be coordinated with the OA-10 safety officer, who, in turn, coordinates with the DOE field element and facility safety officers.

Task 5: Select Final Scope

Once the information gained from document reviews, discussions with facility representatives, and coordination with other topic teams is reviewed, the topic team must decide where to focus its inspection efforts. Topic teams should consider every subtopic for inspection during the planning activity, even though the depth to which a subtopic is inspected may vary.

Since many topics are fairly large and complex, it is not feasible to comprehensively review every facet of the topic. Consequently, the scope of the topic is customized to the resources available and the need to maintain high standards of quality in all inspection activities. The underlying principle is that the quality of the inspection takes precedence over the quantity of areas reviewed.

If, during the planning meeting, serious issues or problems are identified in an area not scheduled for inspection, the topic team may recommend additional inspection activities, which might require adding personnel to the topic team, deleting another subtopic, or scaling back the scope of activities in other subtopics. The Inspection Chief should be consulted as soon as possible regarding the allocation of additional resources, reallocation of existing resources, or rescoping of the topic.

The topic team must clarify the broad focus of their inspection activities. Then, they should discuss issues arising from the data reviewed and begin to make decisions that will narrow the focus of their inspection activities before they begin planning individual data collection.

Some of these decisions may be made in response to the Inspection Chief's guidance or coordination with other topic teams. However, decisions are generally left to the topic team

itself and are based on site-specific conditions and inspection-specific objectives. In the absence of overriding conditions and objectives, topic teams should focus on the most important programmatic elements and devote less time to relatively unimportant areas or areas that have proven to be less problematic in recent inspections. It is important that the selection of elements for review be logical and defensible, and provide for a balanced approach that will accomplish the inspection objectives.

Task 6: Select and Prioritize Data Collection Activities

Data collection activities are the essential activities of the inspection process. The data collection methods and techniques that are chosen, and the skill with which they are applied, determine the quality and quantity of information available for evaluation.

Once the topic team has narrowed the inspection focus and finalized the subtopics to be inspected, they must select appropriate data collection methods. Data collection tools and their applications are detailed in the topic-specific inspectors guides. Methods are selected to yield the most accurate, realistic, and useful data for the particular application.

One preferred method of gathering data is to actually watch the responsible individuals perform their assigned tasks, and to review documents pertaining to the program being inspected. Unfortunately, this is not always convenient or possible. Often activities that the inspectors want to observe may not occur while the inspection is in progress. The allocated time, personnel (both site personnel and inspectors), facilities, and other resources may also limit opportunities to observe program functions. OA-10 also relies on performance testing to evaluate programs under controlled conditions.

In addition, data collection priorities must be established. The topic team should attempt to schedule data collection activities for the entire data collection period to avoid wasting collection time if events run smoothly. However, when events do not run smoothly, data collection priorities allow the topic team to delete less important activities and concentrate on gathering essential data required to determine program effectiveness.

Task 7: Identify and Select Sample Sizes and Configurations

Sample size and configuration are important planning points that must be determined for many data collection activities. Since inspectors usually cannot review every document or observe every activity related to their topic, they must examine a sample of the population to form conclusions about the entire population under review.

The sample tested must be large enough to provide a reasonable indication of the entire population under review. For example, examining 10 items from a population of 50,000 would hardly provide a useful result; conversely, examination of all 50,000 items would be clearly impossible, and unnecessary.

Similarly, the sample tested must be representative of the system involved, and the components of the sample must have qualifications or conditions in common. For example, a sample of Top Secret documents could only be representative of documents in a Top Secret document system, and could not be used to draw conclusions about a Secret or sensitive document system.

Planning for each data collection activity should include a determination of how many items will be examined, and how they will be selected.

The topic team should know essentially what will constitute the sample before data collection begins. However, in certain tests, the topic team must not inform the inspected facility of the identity of the samples until the inspection activity or performance test actually begins.

Population Identification

Before selecting a sample for a particular data collection activity, the appropriate population must be identified. For example, if skills common to all members of the protective force are to be tested, the appropriate population would be the entire protective force. However, if skills required only of special response team members are to be tested, the appropriate population would be limited to special response team members.

Sample Size and Configuration

Sample size normally depends on the size and availability of the population, and the available time. In general, the larger the sample, the better; but sample size must often be limited. Inspectors should strive to test at least the minimum recommended sample size for the population. However, if that is impractical, the need to use a smaller sample should not deter data collection. The topic team must exercise judgment in this regard.

The sample size, once set, may be changed if conditions warrant. For example, if the initial sample yields inconclusive results, the topic team may choose to expand the sample to get a more accurate picture of the status of the subtopic.

The most important factor in sample configuration is that the sample be representative of the entire population. The best way to ensure that the sample is representative is to use statistically valid random selection techniques. When statistically valid random samples are not required or possible, samples are selected based

on available time and resources, with every attempt to select the best representation of the total population.

Statistically Valid Samples

Statistically valid samples are essential only if the topic team intends to make a formal statistical inference from the results. Validity in such analyses results from strict adherence to specific random sample selection and testing procedures. Additional detailed information may be found in textbooks on statistics.

Task 8: Assign Tasks and Schedule Activities

All data collection tasks should be assigned and scheduled during the planning meeting to ensure the effective use of the time available for onsite data collection. Scheduling provides the basis for logistical planning and is accomplished best during the latter phases of the planning meeting, when the entire topic team is present and inspection priorities are fresh in their minds.

The topic lead is responsible for assigning specific data collection (and data collection planning) tasks to team members. Usually these tasks are assigned by mutual consent, based on the strengths of each team member. Assignments should be recorded in writing. Additional guidelines include:

- Although the skill mixture among team members will vary, assignments should be made to take advantage of each team member's skills and areas of expertise.
- Workloads should be evenly distributed; inspectors assigned major tasks should be assigned fewer tasks.
- Whenever possible, inspectors should work in pairs during data collection. Although time limitations may require individuals to work alone, two inspectors should be

assigned to each task where there is a reasonable potential for disagreement, conflict, or poor performance.

- A person new to the specific subtopic or system should always be paired with an experienced inspector. First-time inspectors should be scheduled to participate in or observe as many data collection activities as possible, instead of being required to complete a specific task from start to finish.
- When inspecting facilities with several quasi-independent systems, it is normally more efficient to form smaller teams of inspectors, with each smaller team reviewing one or more aspects of the system.
- Scheduling should always provide time for daily validation sessions, analysis of data collected, and anticipated inspection team meetings.

A detailed and realistic schedule should be worked out for all inspection activities, but all involved should understand that the schedule may change to accommodate situations encountered during the inspection. The schedule may begin as an outline of data collection activities, locations, and general times (morning, afternoon, evening). Specific times and locations for each event will be worked out during detailed planning by team members.

Additional scheduling considerations are:

- High priority critical and major events (for example, performance tests) should be scheduled first.
- Higher priority tasks should take place early in the data collection period so that the schedule can be slipped if problems arise.
- Travel distances and time of year (weather) should be taken into account.

- The number of hours scheduled should be reasonable.

Task 9: Plan Data Collection Activities

Each inspector is responsible for planning the details of his or her data collection tasks. Although planning is required for each inspection activity, the planning process will vary greatly, depending on the nature of the activity involved. Typically, detailed planning takes place during the planning meeting, but may continue and culminate during the period between the planning meeting and the return to the site for data collection. However, for some more involved activities, the planning process may continue into the onsite data collection period, especially when safety coordination is required.

Plans must address all items required to accomplish the data collection activity. Some common items that must be determined and arranged before actual data collection activities begin are:

- Location of the activity
- Time of the activity
- Sample size and configuration (people, documents, equipment)
- Equipment needed, and who will provide it
- How the activity (test) will be administered
- Who will evaluate the activity
- What evaluation standards apply
- Questions and answers for written tests
- Questions to be asked during interviews

- What data collection forms need to be developed, if any
- What evaluator checklists are to be used and who will prepare them
- What safety considerations apply and who will coordinate.

Performance tests require detailed planning. Performance tests are addressed in some detail in Section 4 and in more detail in the topic-specific Inspectors Guides.

Task 10: Identify and Arrange Support

As many requirements as possible, including likely support requirements, should be identified during the planning meeting so that they can be discussed in person with facility and DOE field element contacts. Support requirements include internal administrative, secretarial, and writing/editing support, as well as external support in providing site access, facilities, points of contact, personnel, and documentation.

Internal support is provided by OA-10 staff or support contractors. It is the topic lead's responsibility to make the necessary notifications or arrangements for internal support.

External support is provided by the inspected facility or DOE field element. External support requirements must be communicated to the designated points of contact as early as possible, preferably during the planning meeting. Points of contact are responsible for seeing that requested support is provided. External support largely consists of personnel, facilities, and equipment. Figure 6 provides a checklist of items to discuss with the points of contact and includes typical categories of requested support.

Task 11: Brief Management

Each topic lead briefs OA-10 management at the end of the planning meeting. The briefing provides background on the topics to be inspected at the facility, indicates the planned focus of inspection activities, and discusses anticipated problems in conducting the inspection. The Inspection Chief provides the format and schedule for the briefing. Topic team members should be prepared to revise their plans following the briefing, if directed by management. OA-10 management briefs the Director of OA about the planned inspection activities, typically at the end of the planning meeting. Topic teams should also be prepared to provide input for a status report to the Secretary regarding issues and program status determined so far.

Post-Planning Meeting Activities

Planning and coordination activities often continue between the planning meeting and the return to the site for data collection and closure.

Topic team members refine detailed planning for performance tests and other data collection activities, including revising areas of emphasis, populations, and random samples.

Continuing Planning Activities

Although inspection planning takes place before the inspection to the maximum extent possible, plans for individual data collection activities may need subsequent revision—perhaps even up until the activities have been completed. The more complex the activity, the greater the chance that plans will have to be revised before or during inspection conduct. Therefore, plans should not be considered as “set in concrete,” and topic team members should be prepared to continue the planning process, as required, during the onsite conduct of the inspection.

The following items should be discussed with the DOE field element and facility points of contact during the planning meeting. This will ensure that they understand the planned scope of the inspection and exactly what they are expected to accomplish or arrange before and during the inspection visit.

- _____ Point of contact responsibilities
- _____ Trusted agent responsibilities (if applicable)
- _____ Data collection activities to be conducted (in general)
- _____ DOE policy/program elements to be inspected
- _____ Date/time/location of major activities
- _____ Personnel required for each activity (including subjects, safety, radiological controls)
- _____ Requirements for additional points of contact
- _____ Documents/records to be made available
- _____ Facilities
- _____ Inspector access
- _____ Availability of personnel if activity must continue after normal work hours

- _____
- _____
- _____
- _____
- _____
- _____

Figure 6. Point of Contact Briefing Checklist

This page is intentionally left blank.

Section 4

CONDUCT

Contents

Introduction	27
Goals	27
Scope of the Onsite Inspection	27
Protection of Classified Information	28
Relations with Site and Headquarters Personnel	28
Data Collection	28
Document Reviews	29
Observations	29
Interviews	30
Knowledge Tests	30
Performance Tests	31
Other Methods	32
Data Collection Forms	32
Integration	32
Validation	32
Daily Validation	33
Major Deficiency Identification	33
Summary Validation	33
Report Review	34

Introduction

The conduct phase is the onsite data gathering period, normally comprising the first four to seven days of the inspection data collection visit. Although some data collection occurs during the planning meeting, the bulk of it occurs during the conduct phase. It is a period of intense and varied activity for the entire inspection team and many site personnel involved in the inspection. This stage of the inspection is crucial, because the inspectors collect most of the information they need to determine whether the protection programs meet requirements and are effective.

This section discusses the goals and scope of inspection conduct, administrative requirements,

data collection methods, and data validation procedures.

Goals

The goal in conducting the inspection is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

Scope of the Onsite Inspection

The inspection team's activities normally begin with a meeting between topic team members and points of contact. This meeting provides the opportunity to:

- Review follow-up items from the planning meeting
- Receive reports from the points of contact regarding support arrangements
- Discuss any issues that may have developed since the planning meeting
- Work out details of the inspection schedule (for example, escorts for inspectors, and points of contact for each activity)
- Identify and discuss any additional actions.

Data collection activities generally follow the plans and schedules developed during the planning meeting. Inspectors normally focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, inspection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Problems or potential problems that become apparent during the course of the inspection should not be ignored simply because they were not included in formal planning.

Significant changes to planned activities should be discussed with the topic leads and approved by the Inspection Chief before being implemented. All changes should be discussed and coordinated with the points of contact to avoid scheduling conflicts and other potential problems.

Protection of Classified Information

Inspectors usually must handle classified documents and sensitive unclassified information during the course of an inspection. This information may be provided by OA-10, screened as part of the inspection process, borrowed from the facility being inspected, or generated by the inspectors. Additionally, most inspectors use

classified word processing equipment during the inspection.

Inspectors are required to comply fully with all applicable DOE and local security requirements, especially those concerning classified computers, documents, and discussions. The Inspection Chief will provide for appropriate site-specific guidance and instructions to the team on these matters. All team members must comply with the policy and guidance issued.

The Administrative Support Coordinator is normally in charge of controlling classified matter in the custody of the inspection team. Documents generated by team members must be reviewed for classification by a designated team member who is an Authorized Derivative Classifier.

Relations with Site and Headquarters Personnel

As discussed in Section 2, the cooperation and assistance of line organization personnel—whether representing DOE Headquarters, the DOE field element, or facility contractor organizations—are crucial in conducting a successful inspection. Inspectors should maintain the highest standards of conduct when dealing with points of contact, supervisors, security managers, and other personnel during the course of inspection activities. Professional conduct and relationships with personnel, points of contact, and trusted agents are covered in more detail in Appendix B of the OA Appraisal Process Protocols.

Data Collection

Data collection is the heart of the inspection process. While some data are collected by way of document reviews and interviews during inspection planning, most data are collected on site during the conduct phase of the inspection. Topic inspection teams may use a variety of methods to gather data. Specific methods vary, depending on the subtopics being inspected, site

conditions, and preferences of the topic team members. Inspectors use five basic methods to collect data: document reviews, observations, interviews, knowledge tests, and performance tests. Each of these methods possesses inherent strengths and limitations; inspectors should carefully choose data collection methods and attempt, when possible, to employ complementary methods to ensure complete and accurate data development.

Document Reviews

All protection programs rely on detailed documentation to ensure that they are effective and properly administered. The lack of well-developed, comprehensive policies and procedures is often the first indication an inspector receives that the program may be deficient. Therefore, reviewing documentation 1) determines whether written policies and procedures are consistent with DOE requirements; 2) provides a baseline picture of how the program operates; and 3) may reveal weaknesses that need further exploration.

The team may request that certain information be made available at the site, ready for team use at the beginning of the inspection visit. Reviewing documentation continues throughout the data collection phase. Often, inspectors must request additional documents during data gathering to develop a complete picture of facility programs and how they function. Requests for additional documentation should be made to the appropriate point of contact. If difficulties are encountered, the Inspection Chief should make a follow-up request directly to facility management.

Documents of interest are usually 1) policy documents on how the protection programs are supposed to function; and 2) records indicating whether facility programs comply with requirements.

Policy documents normally include, but are not limited to, security plans, policies, and procedural guides.

Records of interest include administrative records, document control records, records indicating completion of required reviews or actions, training records, equipment maintenance/calibration records, and inventory records.

Observations

Observations allow inspectors to see how site personnel actually do their jobs, and to evaluate their performance of duties under normal conditions. Such observations provide the best data on whether site personnel follow established procedures, and whether they properly operate any equipment for which they are responsible.

Observations should be made at as many key points in the program as practical. Not all observations need be scheduled inspection activities. Observing personnel at work is an opportunity for adding to data being gathered or helping to validate data already collected.

Although observation of personnel performing their duties would seem to be an ideal inspection tool, it is not necessarily simple:

- The team members must decide how much time they can allocate for observation. Will an hour spent watching a specific task yield an hour's worth of usable data? In many instances, the answer to such a question will be "no," since not all activities associated with the program being inspected occur on a predictable schedule.
- The presence of an inspector may influence the behavior of the individual being observed, and produce erroneous data. This may be particularly true if the individual's supervisor or other site representatives are present.

- The results of observation, frequently subjective, may lead to disagreement between the inspection team and site personnel on what was actually observed and may be difficult to validate.

For these reasons, observation as a data collection method is generally confined to rounding out the inspection team's overall understanding of how routine tasks are carried out, or to evaluate performance in specific areas.

Interviews

Interviews actually begin during the planning phase, when inspected personnel and points of contact are asked to provide information on certain aspects of the facility's security program.

Interviews also provide an important continuing source of information about the protection programs during the inspection.

Any person associated with the program being inspected is a potential interview candidate. Although interviews are often used to confirm or round out the inspector's knowledge, they are most effective in determining perceptions and individual understanding of policies, procedures, and duties.

OA-10 uses both formal and informal interview techniques. For formal interviews, topic teams prepare a series of questions based on review of documentation during the planning meeting. The questions are then asked during scheduled interviews with DOE Headquarters, the DOE field element, and facility contractor representatives. Whenever possible, OA-10 Federal staff should be present at management interviews; an OA-10 manager should be present for interviews of senior managers. Interview techniques are discussed in some detail in Appendix A of the OA Appraisal Process Protocols.

Points of contact can usually answer many of the questions during the planning meeting. When a question cannot be answered immediately, site representatives are expected to provide an answer

during the interval between the planning meeting and the beginning of onsite data collection, or when the inspection team arrives on site. Informal questions are those that arise from interactions between inspection team members and site personnel. Whether during a scheduled interview or an incidental conversation, inspectors should pay attention to what site personnel say and follow up on subjects of interest.

Since important issues may arise in an unpredictable manner, team members should be cautious about questioning site personnel in the absence of an assigned point of contact. Information elicited when a point of contact is not present may prove impossible to validate. By the same token, inspectors should be wary of attempts by points of contact to coach interviewees or to influence the interview.

Knowledge Tests

The key to successful program implementation is how well personnel know and perform their duties. Job knowledge is normally assessed by interviewing personnel involved in the topic or subtopic during the inspection.

There is a certain body of knowledge, some Department-wide and some site-specific, that people associated with any program must possess. Formal knowledge tests are an effective way to determine whether personnel possess this knowledge. Oral, written, or combined oral-written tests are most often used.

When knowledge tests are given, a representative sample of the appropriate population should be tested. Questions and answers should be carefully validated before the test is administered to ensure that the test is properly constructed to achieve its intended purpose. Inspectors should understand that knowledge tests indicate only whether personnel are knowledgeable in certain areas, not whether they can apply that knowledge or perform related duties.

Performance Tests

Performance testing is one of the most valuable data collection methods used during the inspection. In contrast with knowledge testing, performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether equipment is functional and appropriate. A performance test is a test in which elements of a protection program—personnel, procedures, or equipment—are tested to determine whether they can actually perform or produce what is required.

Virtually any skill, duty, procedure, or item of equipment can be performance-tested. Performance tests may vary in complexity from the simple duplication of a classified document to more complicated and elaborate tests involving adversaries, Engagement Simulation System/Multiple Integrated Laser Engagement System equipment, aircraft, and large numbers of Security Police Officers.

Some tests can be conducted under completely normal conditions, where the subject is unaware of the testing. Other tests must be conducted under artificial conditions, although maximum realism is always a primary consideration.

To promote safety and realism in performance testing, OA-10 has established formal protocols for planning and conducting certain performance tests. These are detailed in the topic-specific Inspectors Guides.

Before any performance test is conducted, all test activities must be coordinated with site representatives. In tests where the subjects are aware that they are participating in a test, all participants should be briefed in detail concerning the actions expected of them; topic team members responsible for conducting the performance test should exercise careful control of all activities during the test; and test results

should be validated as soon as possible after the test is completed.

A sample performance test plan format, intended as a convenient guide for describing proposed tests and as a quick reference during the actual conduct of the test, is provided below. The format can be adapted to fit test requirements at varying levels of complexity. The most complex format contains:

- **Objective** — Identifies the portion of the program the test is to measure and briefly describes what the test is designed to accomplish.
- **System Description** — Provides a succinct characterization of the system. This helps team members understand system parameters and serves as a quick refresher that can be reviewed immediately before beginning the test.
- **Sampling Technique** — Explains how the sample to be tested will be selected and handled and serves as a record of these actions for future reference.
- **Scenario** — Describes how the performance test will be conducted. The scenario may include specific points that must be covered to serve as a reminder to personnel performing the test. Frequently, for less complex performance tests, the system description and sampling technique are discussed together under this heading instead of in separate sections.
- **Evaluation Criteria** — Provides the applicable references—DOE order, directive, or standard—that will be used to determine whether requirements are met.
- **Safety Plan** — If the performance test has safety implications, a detailed safety plan is required.

- **Additional Controls** — In some cases, specialized coordinators, such as a range officer or radiological control personnel, may be required.

This format should not be considered mandatory. In some cases, facility contractors have developed acceptable formats that their personnel are used to, and it may be convenient to use the local format. However, whichever format is used should provide sufficient detail to plan and conduct the test and to serve as a reference and record of what was accomplished.

Major Engagement Simulation System-enhanced performance tests of a facility's tactical response capabilities are not normally conducted during comprehensive inspections. The extensive planning, coordination, and resource requirements associated with such tests, and their potential impact upon other data collection activities preclude their inclusion during the normal course of a comprehensive inspection visit. When indicated, such major performance tests will normally be conducted as a special inspection, using the protocols established in the *Context and Protocols for Performance Testing of Protective Forces*.

Other Methods

While the five basic methods of data collection described above will satisfy most inspection data collection needs, team members may use any legitimate method to most effectively collect needed information. Other methods, such as the use of surveys or questionnaires for example, may be used when appropriate.

Data Collection Forms

Collected data must be recorded in a standard manner so that it can be properly analyzed and archived. On a daily basis, inspectors are required to record pertinent data on the OA-10 Data Collection Form. The form accommodates a discussion of collected data, including its importance, its impact on the program being

evaluated, and necessary follow-up activities. It can be modified as more data is collected or its impact changes. A copy of the Data Collection Form format is provided in Appendix B. An electronic version of the form is available from the Inspection Chief. All Data Collection Forms must be completed in an electronic file format, and will be archived by OA-10 for future reference.

In addition to internal topic team use, completed Data Collection Forms are to be turned in to the Inspection Chief daily, and will be used to develop the daily briefing for DOE field element and facility managers. Completed forms must be reviewed for classification, as appropriate.

Integration

Information sharing among topic team members and between topic teams is imperative. Information collected by one team member may have a direct impact on a line of investigation being pursued by another. Information collected by one topic team may become more significant when combined with information collected by another topic team. It is absolutely essential for the PPM topic team to be aware of the data being collected by other topic teams. Consequently, a conscious and deliberate effort at timely information integration is a necessity. Integration is conducted both formally and informally. Informal integration is expected on a daily basis between topic team members and between topic teams. Inspectors are expected to make a deliberate effort to share information they have collected with other team members who may find it useful, and to seek out needed information from team members who may have it. More formal integration is achieved through team meetings called by the Inspection Chief and by reading the folding containing all Data Collection Forms.

Validation

Validation is the process inspectors use to verify the accuracy of the information they have

obtained during data collection activities. It is the most critical element of the onsite inspection. Validation is a continuous process to ensure that:

- All data collected by the inspectors are factually correct and can be used to evaluate the effectiveness of the program.
- Points of contact and site management are aware of the data that have been collected. They must either acknowledge its accuracy, provide correct information, request that further data be collected, or provide mitigating information. Representatives of the Cognizant Secretarial Office (CSO), Lead Program Secretarial Office (LPSO), DOE field element, and facility contractor may participate in validations.

Information to be validated should be presented as thoroughly, accurately, and concisely as possible. The purpose of validation is to ensure that points of contact agree with the accuracy of the information collected and understand its potential implications and impacts.

Daily Validation

Inspectors are required to validate inspection results with their points of contact on a daily basis. The exact method of validation depends on the topic team, the points of contact, and the schedule of events. Even if the points of contact accompany the inspectors on every inspection activity and validate observations on the spot, a daily validation meeting is required. Usually, a short meeting is held at the end of the day to validate the day's events. At times, particularly if activities extend late into the evening, the daily validation meeting may be held the following morning. However, any such delay should be discussed with the Inspection Chief since this could cause facility management to receive reports of potential problems before the points of contact know the issues involved.

Major Deficiency Identification

When serious or potentially serious deficiencies are identified during an inspection, they are to be brought to the attention of the Inspection Chief and the appropriate DOE field element and facility personnel (usually managers) as soon as possible. Once enough data is collected to be reasonably sure that a significant or potentially significant deficiency exists—particularly a rating-impacting deficiency—it is to be identified and formally communicated to site managers in sufficient detail to ensure that it is fully understood. This formal communication is achieved through the use of the Issue Form, a copy of which is provided in Appendix B (electronic copies may be obtained from the Inspection Chief). The topic team is responsible for completing the form, which is submitted to and signed by the Inspection Chief, who forwards it to the DOE field element/facility. The responsible field element or facility organization is required to respond to the issue paper in writing, and may also request a meeting to discuss or further clarify the deficiency and its potential impact.

Deficiencies identified in this manner may or may not ultimately result in formal findings, depending on the individual circumstances. The Inspection Chief will communicate significant deficiencies to the OA-10 Director, who will, when appropriate, inform the OA Director. As necessary, the OA Director will inform senior Departmental managers.

Summary Validation

A summary validation is held after data collection activities are completed. Ideally, the summary validation is conducted at the working level and attended by members of the topic team and points of contact for the program; however, summary validations are often attended by senior managers and representatives of interested

Headquarters organizations. At the summary validation all significant information, including items validated previously, are validated again. This is the final validation activity before inspection report preparation. Although actual (or even potential) ratings should not be discussed, the validation process should ensure that the issues and their impacts are fully understood so that there will be no surprises in the report.

Report Review

The final validation steps involve factual accuracy reviews of the draft inspection report and the final draft inspection report. When a draft report has been reviewed by the Quality Review Board and tentatively approved by the OA Director, it is provided to the DOE field element (which may share it with the LPSO/CSO and facility contractor) for a same-day factual accuracy review. The final report is similarly provided, with the responsible organizations having ten working days to provide written comments to OA-10.

Section 5

CLOSURE

Contents

Introduction	35
Goals	35
Data Review	36
Integration	36
Analysis of Results	36
Determining Findings	36
Ratings	37
Focus Briefing	37
Report Preparation	38
Initial Draft	38
Quality Review Board	38
OA Director's Review	38
DOE Field Element Comments	39
Final Draft	39
Additional Team Responsibilities	39
Process Improvement	39
Outbriefing	39

Introduction

After data collection, the data must be assimilated, compiled, and analyzed in order to report the results. The inspection closure process usually takes place during the last week of the inspection visit and includes a number of tasks to ensure that all pertinent information is accurate, reported in a standardized format, and appropriate for the intended audience.

This section discusses the tasks involved in inspection closure, including data review, analysis of results, determination of findings, assignment of ratings, and integration with other topics. These tasks form the basis for the inspection report. Other closure tasks include preparing briefing materials, reporting policy

issues, and accomplishing various administrative actions.

Goals

The goals of inspection closure are to:

- Identify and clearly report the inspection results, including both strengths and weaknesses
- Determine the individual and cumulative impact of inspection results on the ability of the protection program to accomplish its mission requirements
- Assign rating(s) that accurately reflect the actual performance of the program(s) (for inspections where ratings are assigned)

- Report inspection results to local management
- Produce a report that clearly and objectively represents the current status of protection programs, including an assessment of mission performance
- Brief Headquarters management and other appropriate parties
- Complete all routine and special tasks that may be assigned by the Inspection Chief.

Data Review

Data review consists of sorting out and logically grouping all validated data collected for each topic and subtopic during any phase of the inspection. Although the topic teams are generally aware of most of this data, not all team members will be familiar with all data collected. Consequently, the topic teams must review all pertinent data to develop a comprehensive picture of how effectively the protection program meets requirements.

Topic teams generally arrange the collected data according to positive or negative features to aid in clearly identifying strengths, weaknesses, and positive or negative trends. Proper organization and thorough review of all inspection data are essential to completing the analysis and preparing the report.

Integration

Data gathered and developed by one topic team often affect other topics being inspected. To take this interdependency into account, topic teams continue their integration activities until all pertinent information has been shared. This integration normally consists of a discussion of inspection results among topic teams regarding how information developed by one team influences the adequacy of the performance observed in another topic area.

Each topic team should consider information obtained through integration, along with its own data, during data analysis. When necessary, the inspector who observed the data to be integrated may prepare draft input for use by another topic team.

Analysis of Results

The continuous process of analyzing collected information culminates during the closure phase, when all data are critically reviewed—a review that results in conclusions regarding the effectiveness of the evaluated program. A discussion of the analysis process is contained in Section 5 of the OA Appraisal Process Protocols.

Determining Findings

Each topic team is responsible for determining which inspection results are designated as findings; findings usually identify aspects of the program that do not meet the intent of DOE policy. Although any program element or system not in compliance with DOE policy or not meeting DOE performance standards may be identified as a finding, topic teams are expected to exercise judgment. Minor and non-systemic items are omitted.

Findings are presented in a manner that identifies both the specific problem and the reference (DOE order requirement). If findings address specific aspects of a standard, the topic team should determine whether the potential findings should be “rolled up” and reported as a single finding. This “rollup” may be appropriate if the single finding statement can clearly and completely convey the problems. Findings should always be worded to express the specific nature of the deficiency, clearly indicate whether the deficiency is localized or indicative of a trend, and clearly identify the organization responsible for the deficiency. Typically, the impact is presented immediately after each finding and includes compensatory measures,

mitigating factors and current and planned corrective actions.

Ratings

The rating system OA-10 uses to characterize the status of safeguards and security programs at DOE facilities is summarized in Section 5 of the OA Appraisal Process Protocols.

OA-10 assigns ratings based on a thorough analysis of inspection results and their implications. The OA-10 inspectors are responsible for assigning ratings; however, internal OA-10 protocols require the inspectors to defend the validity of the ratings with the inspection manager. In turn, the manager presents the validations to the Director of Independent Oversight and Performance Assurance. This layered “check and balance” concept of operation assures the highest degree of confidence that the ratings are fair and objective.

For comprehensive inspections, OA-10 normally assigns ratings at two levels: topic level and overall safeguards and security program level. However, when special inspections or major performance tests evaluate subtopical or cross-topical elements of a program, ratings may be assigned to indicate the performance level of the specific program elements evaluated. This rating system provides the necessary flexibility to allow use of the most appropriate rating structure for each individual situation encountered.

In rating topics (or subtopics), the analysis (and rating) is applied to the standard at the topic level. Inspection results in each subtopic are evaluated and analyzed. Deficiencies in one subtopic do not necessarily determine the topic rating. For example, deficiencies in a protective force training program do not necessarily lower the topic rating; if no other significant deficiencies exist, and if the protective force can adequately accomplish its mission (that is, meet

the requirements of the topic standard), the topic area could be rated Satisfactory.

For the purposes of rating the “bottom-line” effectiveness of a safeguards and security program, OA-10 analyzes and integrates the results of all topic areas to determine how well the program accomplishes its basic purposes. This analysis cuts across topics and recognizes the interrelationships of the various programs and functions represented by the topics; that is, the functions represented by each topic do not stand alone, but are all interrelated parts of a single safeguards and security program. This integration and analysis process is complex, and cannot follow a strict formula of “averaging” topic area ratings. Weaknesses in one or more topics may not significantly affect the overall rating if those weaknesses are mitigated by strengths in other topics and do not significantly affect the protection level. On the other hand, a catastrophic weakness in one topic, or pervasive weaknesses throughout several topics, can affect the overall program rating if the soundness of the overall system is degraded.

At times, particularly during special inspections, including major performance tests, OA-10 inspects and rates performance on issues, functions, or program elements that do not fit into the discrete boxes defined by topics. In such cases, OA-10 has the latitude to clearly define the scope and purpose of the inspection, and to rate performance associated with the specific issue inspected. The same terminology and definitions are used.

Focus Briefing

Early in the inspection closure process (typically on Saturday morning following data collection week), each topic team briefs the OA-10 Director. The briefing covers major inspection results, conclusions of preliminary analyses, the intended focus of the topic reports, potential enhancements, and tentative ratings. The purpose of the briefing is to ensure early in the

report-writing process that each topic team is focused on key issues, has sufficient data to support its conclusions, and has adequately integrated with other topics. The briefing format is provided by the Inspection Chief.

Report Preparation

The inspection report is the formal product of the inspection process and is intended for dissemination to appropriate managers at DOE Headquarters, field elements, and facility contractors. It is the only published record of the activities and results of an inspection, and the information in the reports is used as input to the Annual Report to the President and the Annual Report to the Secretary, both describing the status of safeguards and security in the Department. The report should reflect a balanced view of program strengths and weaknesses.

Each topic team is responsible for writing the report appendix documenting the inspection of its topic area. The information contained in an appendix includes a discussion of the current status of the topic, inspection results, conclusions drawn from those results, a topic rating, and identified opportunities for improvement.

Typically, one individual is assigned to write the main body of the report, which, drawing on information provided in the topical appendices, summarizes the results of the inspection, analyzes and draws conclusions about the effectiveness of the evaluated safeguards and security program, and indicates an overall program rating. Appendix C of the OA Appraisal Process Protocols provides guidance for this process.

A typical report format for a comprehensive inspection is provided in Appendix A. Additional site-specific report format guidance, if different from that provided in Appendix A, is provided

by the Inspection Chief before preparing the report.

The onsite report-writing process follows a fairly standard sequence, from initial to final draft.

Initial Draft

Each topic team produces an initial draft appendix for its topic. Concurrently, the assigned writer begins drafting the main body of the report. When team members, including the topic lead, are satisfied with the initial draft, it is provided (on electronic media) to the Administrative Support Manager for formatting, reproduction, and control, and is then submitted to the Quality Review Board.

Quality Review Board

The Quality Review Board normally consists of several managers and senior personnel from OA-10 and its support contractors. They review each draft report appendix to ensure that it is readable and logical, and that it contains adequate, balanced information to support conclusions and ratings. The Quality Review Board may require topic teams to revise portions of their appendices. Each draft appendix must be reviewed and accepted by the Quality Review Board before the report-writing process continues and the appendix is included in the draft report.

OA Director's Review

Following acceptance by the Quality Review Board, report sections are typically submitted to the OA Director for review and approval. Since the OA Director is usually not on site when this occurs, report sections are often faxed to Headquarters for review. If this review indicates needed changes, the appropriate topic team coordinates with administrative support personnel to make the changes.

DOE Field Element Comments

When each appendix is reviewed and accepted by the Quality Review Board and approved by the OA Director, it is sent to the inspected DOE field element (operations office) for review. The field element staff and, at their discretion, facility contractor staff are allowed a brief period (typically less than one day) to review the draft report for factual accuracy. They may provide written comments concerning any portion of the report that they believe to be in error.

If the CSO has representatives on site, they may also be provided the opportunity to participate in the field element review.

Final Draft

Upon receiving DOE field element comments, the topic teams recommend any appropriate changes to the draft report; the Inspection Chief authorizes any changes merited by field element comments. When all such changes have been made, the final draft of the report is prepared and is normally provided to the manager of the DOE field element at or immediately following the inspection outbriefing.

Additional Team Responsibilities

Topic teams must accomplish several additional inspection-related activities, as required, during the inspection closure process:

- Preparing policy issue papers if the topic team encountered any issues that should be brought to the attention of DOE Headquarters elements (typically the Office of Security and Emergency Operations, but potentially CSOs and/or LPSOs)
- Preparing a one-page executive summary of the inspection results for the Secretary
- Preparing inspection data to be maintained by OA-10 at Headquarters for future

reference and possible use in preparing the Annual Report to the President and the Annual Report to the Secretary

- Returning all site items (for example, documents, access credentials, dosimeters, and special clothing).

Formats and other specific information associated with preparing policy issues are provided in Appendix B.

Process Improvement

OA-10 continuously strives to improve its processes and increase the effectiveness of its oversight activities. Immediate feedback from inspection team members provides important input to the improvement process. Information is solicited from team members regarding possible improvements to any aspect of the inspection process. Typically this is accomplished in a roundtable discussion conducted after the initial draft report sections have been completed but before significant numbers of team members have been released to leave the site. The Inspection Chief determines the time and agenda for the roundtable discussion and assigns a staff member (often the Deputy Inspection Chief) to chair the discussion and record significant results. While the roundtable discussion is the common method for soliciting process improvement information, the Inspection Chief may determine that priorities require other, perhaps less formal, methods to be used to collect this data. The imperative is that all team members have the opportunity to provide input, and that all input is recorded and provided to managers for consideration.

Outbriefing

OA-10 typically provides an outbriefing to managers of inspected organizations before departing a site. The outbriefing is normally scheduled for the morning of the last day on site, but may be scheduled differently if necessary to

accommodate the availability of critical managers. When necessary, the briefing is scheduled for a later date.

The briefing is usually given by the OA-10 Director; the OA Director often attends, particularly following comprehensive inspections.

The OA-10 Director usually designates the topic leads and other team members who will be required to attend. The manager of the DOE element being inspected generally

determines the inspectees who will attend. Typically, managers and primary safeguards and security staff from the DOE field element and the facility contractor will attend, along with any present representatives of the CSO/LPSOs and the Office of Security and Emergency Operations.

Briefing content generally includes summaries of the status—including major strengths and weaknesses—of each topic area inspected and of the overall safeguards and security program, and the ratings assigned to each.

Section 6

FOLLOW-UP

Contents

Introduction	41
Goals	41
Headquarters Briefings	41
Policy Issue Papers	41
Final Report	42
Corrective Action Plan Review	42
Corrective Action Tracking and Follow-up	42

Introduction

Upon completion of the onsite inspection activities, a number of tasks remain to close out an inspection. These include conducting any necessary briefings, preparing and issuing a final inspection report, assessing corrective action plans, submitting any policy issue papers, and preparing to follow corrective actions. This section deals with those tasks, which are normally conducted at Headquarters.

Goals

The goals of the inspection follow-up phase are to appropriately disseminate an accurate account of inspection results through briefings and a final report, review proposed corrective actions for adequacy in addressing deficiencies, and address any policy issues to the appropriate Headquarters element.

Headquarters Briefings

Depending upon the nature and results of an inspection, it may be necessary to brief the Secretary, Deputy Secretary, and/or Under Secretary on significant issues. The (one-page) executive summary of inspection results is submitted to the Secretary (Deputy Secretary, Under Secretary as appropriate); if requested, the

senior official will also be briefed, normally by the OA and/or OA-10 Director(s). Other senior Headquarters managers may attend at the discretion of the senior official being briefed. OA-10 will be prepared to brief the significant inspection results and their implications, but the specific focus of the briefing may be prescribed by the official being briefed.

As soon as practical after OA-10 has received and reviewed the combined CSO/DOE field element comments to the final draft report, the OA-10 Director will coordinate, through the OA Director, with the CSO and DOE field element to schedule a briefing for the DOE Security Council. Whenever possible, the briefing will be conducted at the next regularly scheduled Security Council meeting. OA-10 will brief the inspection results.

Policy Issue Papers

If any policy issue papers result from an inspection, they are finalized (or written, if necessary) upon return to Headquarters, coordinated through OA, and submitted to the appropriate Headquarters organization. Most policy issues will be addressed to the Office of Security and Emergency Operations, but when appropriate they may be addressed to a program office or other policy organization. After

submission of a policy issue paper, OA-10 will be prepared to provide additional information regarding the issue, and will also be prepared to meet and discuss the issue if requested by the action addressee.

Final Report

The CSO and DOE field element have ten working days from their receipt of the final draft report to provide written consolidated comments to OA-10. Upon receipt, the OA-10 staff will review the comments and determine the appropriate responses. One or more topic team members will review the comments for their report section. When necessary, topic team members not located in the Washington area may be contacted by telephone or fax. If comments are received during a subsequent appraisal activity at another site, comments may be reviewed at that location by available team members.

OA-10 will publish a final report ten days after receipt of the CSO/DOE field element comments.

The final report will be distributed to the Office of the Secretary, the Office of Security and Emergency Operations, the CSO, and the DOE field element. OA-10 will limit distribution to those organizations unless instructed otherwise by OA.

Corrective Action Plan Review

The Deputy Secretary established protocols to guide the Department's response to OA appraisal reports in a memorandum issued on August 31, 1999. Those protocols are provided in Appendix D of the OA Appraisal Process Protocols. They include requirements for various stages of corrective action plans and for tracking corrective actions and closing findings. OA-10 is assigned some responsibility under those protocols.

The CSO and the DOE field element have ten working days from receipt of the final draft

report to prepare and provide to OA-10 a **preliminary corrective action plan** to address immediate and initial planned responses to all findings in the OA-10 final draft report. As soon as practical, but within ten days of receipt, OA-10 will provide the CSO and DOE field element appropriate informal comments regarding the adequacy of the proposed corrective actions in correcting the identified deficiencies.

Within 30 working days of receiving the final draft report, the CSO and DOE field element will provide OA-10 with an **interim corrective action plan** addressing, in detail, ongoing and planned corrective actions for each deficiency identified in the final draft report. OA-10 will review and comment on the interim corrective action plan within 15 days of receipt.

Within 30 working days of their receipt of the final report, the CSO and DOE field element will issue a **final corrective action plan**. Final corrective action plans should address, in detail, all completed, ongoing, and long-term actions associated with each finding in the report.

In all cases, the appropriate OA-10 personnel will review the proposed corrective actions; preferably, this will be accomplished by members of the topic teams that reported on the deficiencies being addressed in the corrective action plans.

Corrective Action Tracking and Follow-Up

CSO/DOE field elements are responsible for entering findings and corrective actions into the Safeguards and Security Information Management System, updating corrective action status, and closing findings. OA-10 will monitor corrective action progress and conduct appropriate follow-up through subsequent inspections and follow-up reviews.

APPENDIX A

COMPREHENSIVE INSPECTION REPORT FORMAT

A.1 Purpose	A-1
A.2 General Information	A-1
A.3 Comprehensive Inspection Report Outline	A-2
A.4 Writing the Report	A-3
Annotated Outline	A-4
Example	A-6
A.5 Writing the Appendices	A-12
Annotated Outline	A-13
Example Sections	A-15

APPENDIX A

COMPREHENSIVE INSPECTION REPORT FORMAT

A.1 Purpose

This section describes how an OA-10 comprehensive inspection report is prepared and provides guidance to inspectors, editors, and typists to ensure that the reports are clear and concise and cover essential points for the intended audiences. Questions on report preparation arising during an inspection should be directed to the Inspection Chief. Authors should not deviate from the established format without specific authorization.

In some ways, the process and guidance for preparing a report for other types of inspections (e.g., special inspections or follow-up reviews) is similar and the guidance below may be useful; however, the report outlines may vary for other types of inspections. The Inspection Chief will provide guidance as necessary for other types of inspections.

A.2 General Information

OA-10 comprehensive inspection reports are written for different readers with varying needs and levels of familiarity with the OA-10 inspection process and the specific facility being inspected. For example, experienced program officials need only a general description of the inspection topic to permit a quick understanding of a particular subject or operation. Inspected facility personnel need even less descriptive material, since they are presumed to be familiar with the complexities of their facility. Other readers might not be totally familiar with specific operations of the inspected site and may need more information to understand OA-10 issues and analyses. The report is generally written for readers who are knowledgeable in safeguards and security, but who may not be familiar with the inspected site. The report should reach a balance, not burdening readers with too much detail but giving them enough information to enable them to comprehend the scope of the inspection and the resulting issues.

The comprehensive inspection report is composed of two principal sections: the summary report, or “front end,” that is intended for management-level reading and which provides an overall analysis of the effectiveness of the safeguards and security program; and the appendices, which are intended for those who seek a more detailed account of specific topical inspection activities and issues. Attachments are not necessary in most reports; however, experience has shown that there are times when they are essential to the analysis of an issue. In instances where attachments are deemed critical, the responsible OA-10 manager will decide on the placement and numbering system to be used.

A.3 Comprehensive Inspection Report Outline

OA-10 inspection reports consist of two parts: the report itself, or "front end," and the appendices. The front end is written by designated individual(s) selected before the inspection. The appendices are written by the topic teams who conduct the topic area inspections. The standard outline for the report is provided below. Specific guidelines for writing the report and appendices, including annotated outlines and examples, are provided in following subsections of this appendix.

COMPREHENSIVE SAFEGUARDS AND SECURITY INSPECTION OF THE...

Table of Contents

Acronyms

1.0 Introduction

2.0 Results

3.0 Conclusion

4.0 Rating

APPENDIX A – Supplemental Information

APPENDIX B – Findings

APPENDIX C through I – Topical Inspection Reports

A.4 Writing the Report

The summary report (that is, Sections 1.0 through 4.0) consists of an introduction followed by a discussion of the performance and effectiveness of the various program elements as determined by the inspection activities. The report is a management-level overview integrating the results of the topical inspections and summarizing the "big picture" of a facility's program effectiveness. It contains conclusions and a rating pertaining to the facility's overall safeguards and security program effectiveness.

The report serves to communicate the significant information pertaining to the appraisal, and is supported by the detailed information contained in the topical appendices. It is not merely a summary of the individual appendices, but serves to unify significant results of the various areas, identify trends, and provide an overall analysis of the significant information contained in the appendices. It also expresses conclusions regarding the adequacy of the overall program(s) being evaluated. Although the report is supported by the detail contained in the appendices, it must contain sufficient detail and explanation to stand alone. It should provide the reader with sufficient information to gain an accurate understanding of program status – including both positive and negative aspects, as well as areas that need corrective actions/management attention – without having to read the detailed appendices. If integrated safeguards and security management was a focus of the review, the "front end" report should provide the reader with a summary analysis of performance with regard to the guiding principles of security management. The following annotated outline provides a structure that accommodates this goal.

Summary Report: Annotated Outline**1.0 INTRODUCTION**

(Centered – Times New Roman – Caps – Bold – 12 pt.)

(Note: Text for all sections is Times New Roman 11 pt.)

The introduction should be short, probably no more than two pages in any case, and succinctly written. It may include the following types of information:

- *The type of activity, the office that conducted it, and where and when it was conducted. Includes identification of responsible organizations, such as Cognizant Secretarial Office/Lead Program Office, field element, and major contractors.*
- *Limited background information concerning past performance, including significant problem areas and ratings associated with most recent inspections, surveys, etc. If there were significant problems, may include a brief comment on what corrective (particularly management) actions have been taken.*
- *Any recent major changes, such as contract changes, significant budget changes, mission changes, etc.*
- *The scope and focus of the activity, and, if appropriate, why the activity was conducted.*
- *If Integrated Safeguards and Security Management was a focus of the appraisal, a brief indication of that focus and a very brief overview of what Integrated Safeguards and Security Management is (i.e., a comprehensive and systematic program for integrating security into all aspects of operations).*
- *A brief (one paragraph maximum) synopsis of the major conclusions regarding program status, to give the reader an indication of the bottom line before reading the discussion of inspection results.*
- *A brief (one paragraph maximum) synopsis of the major conclusions regarding program status, to give the reader an indication of the bottom line before reading the discussion of inspection results.*
- *An explanation of where in the report (e.g., front end section, appendices) various types of information (e.g., overall results, detailed results, ratings) can be found.*

2.0 BACKGROUND

(Centered – Times New Roman – Caps – Bold – 12 pt.)

This section provides a summary assessment of results of the appraisal activity. Significant results of the topical area inspections are addressed; less significant results are not necessarily specifically mentioned in this section. This section does not address the results by topic area, but attempts to combine the results of all areas – particularly trying to identify commonalities or trends across topic areas – and provides a balanced discussion of positive and negative program attributes and how they affect overall program performance.

2.1 Positive Program Attributes (Left justified – Times New Roman – Initial Letter Cap – Bold – 12 point)

This sub-section describes significant things that the responsible (HQ, field element, or contractor) organizations have been doing well, and that contribute to program improvement or strength. May include such things as initiatives or good, solid performance in program area, appropriate management attention, particular actions taken to correct past deficiencies, etc. If applicable, should include one or

Summary Report: Annotated Outline (continued)

more paragraphs that summarize the positive aspects of Integrated Safeguards and Security Management at the site and the benefits that have been achieved through Integrated Safeguards and Security

Management. Use of a “bolded bullet” approach (i.e., a bold topic sentence that provides the essence of the positive aspect, followed by supporting detail and examples) is a technique that is effective for communicating to managers .

2.2 Program Weaknesses and Items Requiring Attention *(Left justified – Times New Roman – Initial Letter Cap – Bold – 12 point)*

This sub-section identifies and discusses identified weaknesses that warrant management attention. Not all weaknesses identified in the detailed appendices need to be individually mentioned in this section; some weaknesses (particularly weaknesses in the same topic area) may be grouped and discussed in a broader context. The problem or problem area should be sufficiently explained (including examples, if necessary) to promote understanding; significant mitigating circumstances should be explained; and any significant immediate corrective actions identified. The impact or potential consequences of these weaknesses should be identified if appropriate. If applicable, include one or more paragraphs that address the guiding principles of Integrated Safeguards and Security Management as they relate to the identified weaknesses. Where possible, analyze the root causes of weaknesses in terms of the guiding principles. Use of a “bolded bullet” approach (i.e., a bold topic sentence that provides the essence of the weakness/issue, followed by supporting detail and examples) is encouraged.

3.0 CONCLUSION

(Centered – Times New Roman – Caps – Bold – 12 pt.)

This section should briefly state the overall conclusion drawn from the activity. It should provide a discussion of the overall program status, relevant to the scope of the appraisal activity. It may discuss whether the program is improving or getting worse. It should identify significant areas that require correction and/or need management attention. It should state the cumulative impact of the (good and bad) results on the overall adequacy of program performance. If applicable, it should include conclusions about the status and ongoing efforts related to Integrated Safeguards and Security Management.

4.0 RATING

(Centered – Times New Roman – Caps – Bold – 12 pt.)

This section provides the rating statement for the overall program being evaluated. It also provides the ratings for the individual topical (or other) areas that were rated.

Example Summary Report

The following is a generic example of a “front end” (summary report) of a longer appraisal report in which the details of appraisal results are contained in individual appendices. This example is provided to illustrate an application of the guidance provided in the previous pages; it should not be considered to be a rigid template that must be copied in all cases. It is not necessary to copy the language of the example when writing actual reports. While the general format and flow of information should be used in all cases, the individual circumstances of each appraisal effort will dictate the specific length and content of the summary report. For example, some of the specific information that may be addressed in the introduction will depend upon such circumstances as mission or contract changes, past problems, recent initiatives, and so forth. The length and complexity of the discussion in the results section will depend upon the results of the topical appraisals. Consequently, the specific circumstances associated with each appraisal should be considered, and appropriate judgment should be exercised in applying the guidance and principles provided above.

Summary Report: Example**1.0 INTRODUCTION (U)**

(U) The Secretary of Energy's Office of Independent Oversight and Performance Assurance (Independent Oversight) conducted an inspection of selected safeguards and security program topics at the AB Operations Office (AB) and the XY Plant (XY) during August 2000. The inspection was conducted by Independent Oversight's Office of Safeguards and Security Evaluations (OA-10).

(U) This inspection evaluated the Department of Energy (DOE) Office of Environmental Management (EM), AB, and contractor implementation of selected security topical areas related to protection of classified and unclassified sensitive information. The topics reviewed were classified matter protection and control (CMPC) and personnel security. The Independent Oversight team evaluated implementation of these programs at the AB offices and at XY.

(U) EM is the lead program secretarial office for AB and the cognizant secretarial office for XY, and has overall Headquarters responsibility for programmatic direction and funding of activities at XY. AB provides operational direction to the contractor and performs line management oversight of activities at XY. Acme-XY (A-XY) is the managing and operating contractor for XY. As the protective force contractor, Hotshot Guards, Inc. (HGI) has responsibility for most security functions, including protective force patrols, access controls at certain portals, and technical operations.

(U) XY received a Satisfactory performance rating in the most recent DOE Annual Report to the President. Previous Independent Oversight reviews of AB, including a follow-up inspection in 1996 and a site profile in 1998, also indicate that overall safeguards and security performance has been adequate. The most recent (February 2000) AB security survey report did not indicate significant problems in AB facility safeguards and security programs.

(U) Inspection results indicate that EM, AB, and XY contractors have established effective CMPC and personnel security programs. These programs comply with DOE requirements and are effectively implemented, with particularly strong management support and a history of quickly and effectively correcting identified deficiencies. Though these programs are strong overall, increased management attention is needed to upgrade technical surveillance counter measures (TSCM) equipment and training, ensure that classified matter is stored in approved repositories, and correct record keeping and timeliness issues in some personnel security activities.

(U) Section 2 of this report provides a summary assessment of results of the inspection of the CMPC and personnel security topics. Section 3 presents conclusions based on those results. Section 4 presents the ratings. Appendix A provides supplemental information on the Independent Oversight team composition. Appendix B identifies the findings that require corrective action and follow-up, as well as a number of policy issues requiring attention at DOE Headquarters. The detailed results of the reviews of the CMPC and personnel security topics are contained in Appendices C and D, respectively.

Summary Report: Example (continued)**2.0 RESULTS (U)****2.1 Positive Program Attributes (U)**

(U) EM, AB, and XY contractors have established generally effective programs in CMPC and personnel security. With some exceptions, the CMPC and personnel security topics comply with DOE requirements and are effectively implemented. As discussed in the following paragraphs, some aspects of these topics were particularly effective.

(U) AB management support for information security is evident and has contributed to a generally effective CMPC program. Although some isolated weaknesses were evident (see Section 2.2 and Appendix C), the protection afforded classified matter is consistent with DOE requirements. Records for documents maintained in accountability systems are concise, accurate, and clear. The foreign ownership, control, or influence (FOCI) program, administrative and physical access controls, security infractions program, and operations security (OPSEC) program are effectively implemented.

(U) The AB and contractor personnel security program has several strengths. Personnel security program elements, including the security education and awareness program, the classified visits program, and the unclassified foreign visits and assignments program, are effectively implemented. One of the programmatic strengths is the unclassified foreign visits and assignments program, which has a formalized and effective process to address counterintelligence, export control, and foreign intelligence requirements. The personnel clearance program and the personnel security assurance program (PSAP) meet the intent of the DOE order, although some weaknesses were evident in documentation and institutionalization of certain elements (see Section 2.2 and Appendix D).

(U) AB and its contractors have been responsive in implementing appropriate corrective actions. Historically, AB management has supported safeguards and security programs and has been proactive in correcting identified weaknesses. For example, AB was effective in resolving problems identified during the 1996 Independent Oversight follow-up inspection involving the registration of work-for-others programs at XY. In this area, AB has established additional controls for work-for-others programs that have the potential to evolve into special access programs. These additional controls (e.g., a documented list of participants) enable AB to more effectively implement DOE requirements (e.g., read-in briefings and debriefings) related to special access programs. In addition, AB has already implemented or initiated appropriate corrective actions to address the CMPC findings of this inspection. For example, AB took prompt action to replace non-GSA approved security containers that were being used to store classified documents.

2.2 Weaknesses and Items Requiring Attention (U)

(U) Although the two AB programs inspected are generally effective, several weaknesses warrant increased management attention by XY contractors, AB, and EM.

Summary Report: Example (continued)

(U) **AB technical surveillance countermeasures (TSCM) equipment, personnel training, and procedures have not been updated to reflect current requirements and threats.** Under the direction of AB, A-XY is responsible for conducting TSCM services for various facilities or programs at AB and XY locations. AB and A-XY use a 1989 TSCM Standard Procedures Guide that has not been updated or supplemented with the DOE Headquarters-issued 1996 TSCM Procedures Manual. Additionally, the TSCM Team Lead and supporting TSCM technologists, who were all certified in 1988 and trained in various ancillary security disciplines, have not since received advanced-level training in the latest, most critical elements of TSCM. Further, periodic maintenance for the existing TSCM equipment suite (such as routine annual calibration) has not been conducted and TSCM equipment is outdated. The weaknesses in TSCM are partially mitigated by the effective security controls at AB and XY facilities, such as access controls, alarm systems, and various administrative controls. AB and A-XY representatives indicated their resolve to correct this situation and immediately initiated efforts to incorporate the latest TSCM requirements and guidance into their procedures, retrain their staff, and seek funding to procure, augment, or update the necessary suite of TSCM equipment.

(U) **CMPC requirements were not effectively implemented in a few areas.** AB facilities were using some (about 19) non-GSA-approved security containers to store classified documents up through Secret/National Security Information. Under a 1998 DOE Headquarters memorandum, such containers can be used under certain circumstances (i.e., when protected by full intrusion detection systems or equivalent protective force patrols). However, not all non-approved containers at AB and XY facilities are afforded this level of protection. Further, AB's practice for protecting classified matter in transit destined for destruction does not comply with either applicable DOE requirements or the site's own documented procedures. According to site-provided documentation, when classified documents destined for destruction are bagged and picked up by a courier (a security police officer) for transport to a central destruction facility, they are transported by two officers in a van within which there is a padlocked cage to secure the documents, and one officer remains with the van at all times. However, at the AB facilities, the procedures were not implemented as required – the Independent Oversight team members observed a single officer collecting bagged documents and placing them in his unoccupied van, which lacked any locked cage. AB took immediate action to identify all unapproved security containers on site, and advised Independent Oversight that their replacement with approved containers was under way and that most containers will be replaced by September 29, 2000. They are also addressing the problems in the transportation of documents to destruction facilities (e.g., installing lock cages and ensuring adherence to site requirements).

(U) **There are weaknesses in PSAP documentation and procedures.** Although the PSAP generally achieves the intent of the final rule, some aspects of the PSAP were not adequately documented and procedures are not in place for certain aspects of the program. For example, AB does not provide formal, documented training to the DOE certifying official or medical personnel, and AB does not have a current PSAP implementation plan as required by Federal regulation. In most cases, the personnel security weaknesses were at least partially mitigated by the knowledge and experience of certain personnel (e.g., the current PSAP certifying official), and other process controls (e.g., memorandum in lieu of the PSAP certification form and informal on-the-job training for the certifying official and medical personnel), so the weaknesses do not have a direct adverse impact on the

Summary Report: Example (continued)

effectiveness of the PSAP. However, AB management attention is needed to ensure that effective corrective actions are taken because these weaknesses place undue reliance on the performance of individuals rather than on clearly documented processes and standards.

(U) **AB is not consistently meeting established timeframes for processing personnel clearance cases.** In approximately 25 percent of 95 cases reviewed, AB did not meet established timeframes for processing cases. Most of these problems involved a failure to meet the 7-day requirement for granting or processing cases containing no derogatory information. In cases where there is no derogatory information, the potential impact on security is negligible. Some cases, however, involved a failure to meet the 30-day requirement to take action (e.g., an interview or letter of interrogatory) on cases in which completed investigations were determined to contain derogatory information. Although no significant problems were noted in the files reviewed, failure to meet the timeframes for cases involving derogatory information could conceivably cause a delay in discontinuing access authorizations where warranted. AB reports that the ability to meet established timeframes is a longstanding problem and will continue to be so. A contributing factor is the incremental nature of the funding for investigations, which often results in surges in cases (e.g., AB may submit a large number of requests for investigations to the Office of Personnel Management when funding is available and receive a large number back for processing within a short interval, all of which must be processed in the established timeframes). Considering the available AB personnel (2 adjudicators) and other factors (their other duties and vacation/illness), AB often had difficulty meeting the established timeframes. Similar problems in meeting the timeframes are evident at many other DOE sites.

3.0 CONCLUSIONS (U)

(U) EM, AB, and AB contractors have established generally effective CMPC and personnel security programs. AB line management support for safeguards and security is evidenced by the historically satisfactory programs at AB sites and by AB's responsiveness in correcting weaknesses identified during this inspection.

(U) AB and contractor management attention is needed to ensure that identified safeguards and security weaknesses are fully analyzed and resolved, including the weaknesses in TSCM, CMPC procedure implementation, PSAP documentation/procedures, and personnel clearance processing timeframes. In addition, improvements in self-assessments could help ensure that deficient conditions are identified and corrected.

(U) While certain items warrant further improvement and increased attention, the deficiencies identified by this inspection are not systemic or pervasive, and they do not significantly degrade the overall effectiveness of protection of classified and sensitive unclassified information. Further, AB and its contractors have already implemented or initiated appropriate corrective actions for the CMPC weaknesses and have taken action to address some aspects of personnel security weaknesses.

Summary Report: Example (continued)**4.0 RATINGS (U)**

(U) *EM, AB, and contractor implementation of the CMPC and personnel security topics provides reasonable assurance that classified and sensitive unclassified information is protected. Therefore, a SATISFACTORY rating is assigned for this limited scope inspection of information security.*

(U) The ratings for the topical areas are:

(U) Classified Matter Protection and Control

SATISFACTORY

(U) Personnel Security

SATISFACTORY

A.5. Writing the Appendices

APPENDIX A – Supplemental information is administrative in nature and primarily identifies the individuals who managed and conducted the inspection. It identifies managers, members of the Quality Review Board, inspectors, and administrative support personnel who participated in the inspection. This appendix is typically prepared by the Deputy Inspection Chief, but it may be assigned to any other member of the inspection team.

APPENDIX B – “Findings” is a chart that consolidates all findings identified in the topical appendices. It is typically prepared by the administrative support staff.

APPENDIX C through I (topical appendices)

The topical appendices are written by the respective topic teams. An annotated outline of the topical appendix is provided on the following pages, followed by examples of typical Introduction and Conclusion sections. The Status and Results sections of the topical appendices contain finding statements. Finding statements are inserted at the appropriate point in the section – usually immediately following the discussion of the problem leading to the finding. Finding statements are preceded by a finding statement designator and are followed (in parenthesis) by the appropriate reference that applies to the finding. Finding statements are **bolded**, and the finding statement designators are formatted as follows:

OR1999-Y12-CS-1

Field 1(OR): Use HQ if a finding against a headquarters element; use the DOE field element symbol (e.g., OR, AL, RL, SR, etc) if a finding against a DOE field element or facility contractor.

Field 2 (1999): Use the four-digit designator for the year in which the inspection occurred.

Field 3 (Y12): Use the symbol for the facility to which the finding applies (e.g., Y12, LANL, LLNL, ORNL, etc.)

Field 4 (CS): Use the symbol for the topic area to which the finding applies (e.g., CS, PS, PSS, PPM, MCA, CMPC, or PF)

Field 5 (1): Sequential finding number. Each topic starts with 1 and assigns sequential numbers (e.g., 1, 2, 3, etc.) to findings in the order that they appear in the topic appendix.

Appendix: Annotated Outline**APPENDIX X**

(Centered – Times New Roman – Bold – 14 pt.)

PROTECTION PROGRAM MANAGEMENT

(Centered – Times New Roman – Bold – 14 pt.)

X.1 INTRODUCTION

(Centered – Times New Roman – Bold – 12 point)

(Note: text in Times New Roman – 11 pt)

(Note: all **subheadings** left-justified in Times New Roman, Bold, 11 pt.)

This section provides introductory information about the scope of the topical inspection, past problems in the topical area, the inspection approach used (data collection methods), and any other information necessary to understand the information in the remainder of the appendix or to place it into proper perspective. It may include pertinent results of recent inspections, surveys, and self-assessments. If only very few or minor deficiencies have been previously identified in the topic, information about the status of ongoing corrective actions may be mentioned here. If all previous findings are closed, that can be stated here also.

X.2 STATUS AND RESULTS

(Centered – Times New Roman – Bold – 12 point)

This section contains the results of topical inspection activities and describes the current status of performance in the topical area. All significant results, both positive and negative, should be discussed in this section. Deficiencies should be fully discussed, including their impact on the topic or protection system. If the deficiency results in a finding, the finding citation should immediately follow the discussion of the deficiency (in the format provided earlier in this appendix). The section may include additional subsections as appropriate to facilitate the logical and understandable reporting of status and results of subtopics or other major areas of effort.

NOTE: If the topic experienced significant deficiencies in the past, and corrective actions are (or should be) continuing, it is customary to divide the Status and Results Section into the following subsections. If there are no current corrective actions to discuss, do not include a subsection on the status of corrective actions.

Also note that the Status and Results section can be internally organized as necessary to most effectively report results. For example, discrete subject areas or subtopics can be addressed under separate sub-headings.

Appendix: Annotated Outline (continued)**X.2.1 Status of Corrective Actions for Past Deficiencies** (Left justified – Times New Roman – Bold –12 point)

Discuss as appropriate the progress and status of corrective actions for identified deficiencies; may include a discussion of the site's assessment of where they stand and any pertinent plans they have regarding future corrective actions. (Again, this subsection is necessary only if identified corrective actions exist).

X.2.2 Current Status of (Topic Name) (Left justified – Times New Roman – Bold –12 point)

The discussion of positive and negative results, described above, is contained in this subsection. If there are findings, they are presented in this subsection immediately following the discussion that identifies the problem associated with the finding. That discussion should include some indication of the impact of the deficiency (which would help explain why it is a finding).

X.3 CONCLUSIONS

(Centered – Times New Roman –Bold – 12 point)

This section contains a discussion and analysis of the impact of the information presented in the previous section. It summarizes and discussed what is good and what is bad regarding the topic's performance, resulting conclusions regarding the effectiveness of performance in the specific topic area.

X.4 RATING

(Centered – Times New Roman –Bold – 12 point)

This section provides the rating assigned to the topic. Normal procedure is to rate the topic area. If circumstances merit, the Inspection Chief or other manager may approve assignment of ratings to subtopic areas.

X.5 OPPORTUNITIES FOR IMPROVEMENT

(Centered – Times New Roman –Bold – 12 point)

This section lists general or specific actions identified by the topic team that the facility could take to correct problems or improve performance in the topic area. The following paragraph is always used to begin this section:

"This Independent Oversight inspection identified the following opportunities for improvement. These potential enhancements are not intended to be prescriptive. Rather, they are intended to be reviewed and evaluated by the responsible DOE and contractor line management and prioritized and modified as appropriate, in accordance with site-specific programmatic safeguards and security objectives."

Example Appendix Sections

The following are examples of typical Introduction and Conclusion sections for a topical appendix. They provide an example of typical content, information flow, and level of detail. They are not intended to prescribe exact verbiage or level of detail; those will vary for each topic area and inspection activity.

Sample Introduction

(U) The primary focus of the inspection of the ZZ Laboratory protective force centered on the protective force's ability to perform the routine and emergency duties associated with the protection of special nuclear material. A secondary focus involved the force's performance of duties associated with the protection of classified matter. Although performance of duties was emphasized, the areas of protective force management, training, and equipment and facilities were also examined. While data collection activities included interviews, document reviews, observation of routine activities, and several limited-scope performance tests, a significant aspect of data collection consisted of a series of large-scale MILES-enhanced performance tests.

(U) The January 1998 OA inspection of the ZZ Laboratory rated the protective force as satisfactory, although noting some deficiencies in basic skills and vehicle reliability. The May 1999 XX Operations Office's security survey rated the ZZ protective force as marginal, noting deficiencies in response plans, firearms qualifications, and tactical response skills.

Sample Conclusion

(U) In general, the physical security systems at ZZ Laboratory are primarily maintained in a manner that effectively balances the protection of SNM with the construction process. With the exception of the coaxial cable reliability problems, all previously identified issues have been or are being corrected. The formal process controlling changes to the alarm systems necessitated by construction assures that unauthorized changes are not implemented and that all responsible parties are notified of changes. Although some physical security system equipment is aging or lacking full support, the operations and maintenance methods in place should be sufficient to ensure satisfactory performance for the remaining required operational life of the equipment.

(U) Although the overall status of physical security systems is positive, some deficiencies were identified during this inspection. The two most notable involve a pathway into the PA without positive intrusion detection coverage, and ineffective MAA exit searches. Both of these require immediate correction to prevent potential degradation in the protection of SNM. The laboratory relies on a robust protective force to assure timely response to any detected intrusion or other security incident within the PA or MAAs. However, weaknesses in physical security systems such as those described here pose unnecessary additional challenges to the protective force. Overall, the physical security systems at ZZ Laboratory continue to perform to adequately support overall mission requirements.

This page is intentionally left blank.

APPENDIX B

FORMS

Data Collection Form B-1

Issue Form B-3

Policy Issue Format B-5

(CLASSIFICATION)

Data Collection Form

Date: _____

(Interim/Final)

Team and Sequence #

Name

Subject:

(Describe the data collection activity or problem being investigated.)

Reference:

(Identify any applicable reference – DOE order or other standard.)

Discussion:

(Record the results of data collection in appropriate detail, or discuss the problem identified.)

Impact:

(Discuss the impact of the items discussed above. If none, so state.)

Follow-Up:

(Identify any planned additional data collection or other follow-up action necessary.)

(CLASSIFICATION)

This page is intentionally left blank.

CLASSIFICATION**ISSUE FORM****Office of Safeguards and Security Evaluations (OA-10)**

Facility:	Topic:	Originator:
PART A		
1. Issue: (Describe the deficiency and its context in as much detail as necessary.)		
2. Impact: (Describe the impact or potential impact of the deficiency in sufficient detail to convey its importance.)		
3. Requirements/Standard: (Reference the DOE order or other standard applicable to the deficiency.)		
Approval: Team Lead _____ Date: _____ Inspection Chief _____ Date: _____		
PART B		
1. Site response: (To be completed by DOE field element or facility contractor)		
2. Action taken if appropriate: (To be completed by DOE field element or facility contractor)		
Approval: Site Representative _____ Date: _____		
Receipt acknowledged: OA-10 Representative _____ Date: _____		

CLASSIFICATION

This page is intentionally left blank.

CLASSIFICATION

POLICY ISSUE FORMAT

Subject

Identify the subject in one phrase or sentence—for example, “Pre-employment Screening.”

Background

Establish the foundation or context for the discussion of the issue or problem that follows. For example, indicate current policy requirements of the conditions you discovered during the inspection that indicate there is a problem.

Problem

Give a brief statement of the problem. For example, discuss whether current DOE policy is too vague, incorrect, nonexistent, or incomplete.

Discussion

Discuss the implications/impact of the stated problem. Indicate how the problem does or can have an adverse impact in DOE security (or other) interests. For example, explain how the vagueness of a DOE order is inviting misinterpretation, and why the policy is therefore not being implemented in the field.

Recommendation (if appropriate)

If appropriate, recommend a course of action, such as evaluate the situation, change the policy, clarify the policy through more detailed guidance, etc.

CLASSIFICATION

This page is intentionally left blank.